

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

LINDA FAIRSTEIN,)	
)	
Plaintiff,)	Case No. 20-cv-8042 (PKC)
)	
v.)	
)	
NETFLIX, INC., AVA DUVERNAY, and)	
ATTICA LOCKE,)	
)	
Defendants.)	
)	

JOINT PRETRIAL ORDER

The parties have conferred among themselves and with the Court pursuant to Rule 16 of the Federal Rules of Civil Procedure. The following statements, directions and agreements are adopted as the Pretrial Order herein.

I. Trial Counsel's Contact Information

The contact information for all counsel participating in the trial is set forth below.

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II. Jury Trial

Linda Fairstein, Netflix, Inc., Ava DuVernay and Attica Locke all request that this action be tried by a jury. Pursuant to the Court's Order dated September 26, 2023, (ECF No. 218), which requires each side to propose a time limit on the presentation of its evidence and argument at trial, the parties state as follows:

A. Plaintiff's Statement

Plaintiff estimates a proposed time limit for the presentation of argument and evidence for her case in chief of 50-55 hours. As the Court is aware this is a multi-defendant case, involving multiple, defamatory statements and a conspiracy claim. Plaintiff has the burden of proof, including on the issue of falsity, necessitating the designation of several witnesses who can speak to the events that occurred in the Central Park Jogger case in 1989. Plaintiff has identified eighteen (18) trial witnesses. One witness, a Netflix employee, will not be made available for Plaintiff's case in chief.

On February 12, 2024, the parties' counsel met and conferred about a number of issues, including the parties' estimates for trial time. For the first time, Defendants' counsel suggested splitting the parties' trial time equally. Plaintiff's counsel said they would consider it but noted that Plaintiff has the burden of proof and that her case would, for that reason, take longer. Also mentioned by Plaintiff's counsel was the fact that recent libel cases in this District, involving fewer statements and

parties, have taken several weeks. For example, a review of the case docket in *Mitre Sports International v. Home Box Office*, Case No. 1:08-cv-09117, a defamation case involving an HBO broadcast, shows that the trial was held over 18 days.

On February 13, 2024, Plaintiff's counsel notified Defendants' counsel that Plaintiff would not be splitting trial time and provided the estimate stated above. Defendants have refused to move from their position that the trial time should be split evenly, or provide an hours estimate for their case in chief. Plaintiff reserves the right to further address this issue at the upcoming PreTrial Conference on March 7, 2024.

B. Defendants' Statement

Defendants believe that the total amount of trial time should be split evenly between Plaintiff and Defendants. Counsel for Defendants have extensively met and conferred with Plaintiff's counsel on this issue. In those discussions, counsel for Defendants made clear that they request an equal distribution of time, regardless of the total time the Court allows. Defendants respectfully make that same request to the Court. Acknowledging that Plaintiff may have the burden of proof, the quantity of evidence that Defendants must put on in order to rebut Plaintiff's claims of falsity and actual malice is significant and actually exceeds the quantum of Plaintiff's evidence. To account for both Plaintiff's burden and the sheer quantity of evidence that Defendants anticipate needing to introduce, an equal distribution of time between the parties would be fair under these circumstances.

Defendants disagree with Plaintiff's estimate of 50-55 hours. Defendants believe that an efficient trial could be conducted in 36 hours per side for a total of 72 hours. While the parties have collectively identified 33 witnesses, only 5 or 6 of those witnesses are likely to have testimony beyond 2 hours per side. The majority of the witnesses are identified for limited issues, such as damages, and are expected to have very short testimony. Assuming approximately 22 hours of testimony per week (5.5 hours of testimony, 4 days per week), Defendants' estimate results in 13 trial days. Under Plaintiff's proposal, an equal distribution would result in 100-110 hours of trial time, or by Defendants' estimates, a 5-week trial. Defendants do not believe a trial of this length is warranted. Nonetheless, and as explained above, Defendants respectfully request an equal distribution of the total time the Court finds to be appropriate.

III. Remaining Claims and Defenses

A. Remaining Claims

Plaintiff states that the remaining claims to be tried are:

- Defamation (libel) *per se* with respect to five scenes in *When They See Us* which falsely depict Plaintiff Linda Fairstein: 1) creating, and manipulating, a timeline of attacks in Central Park to pin the rape of Patricia Meili on Yusef Salaam, Raymond Santana, Kevin Richardson, Antron McCray and Korey Wise; 2) instructing members of the NYPD minors to harshly interrogate minors in custody; 3) ordering a roundup of young Black males in the projects in Harlem; 4) concealing DNA evidence found on a semen-marked sock from defense counsel, and manipulating the timing of its testing, to advantage the prosecution; and 5) at a lunch meeting with Nancy Ryan in which Ryan tells Fairstein that she “coerced those boys into saying what they did,” that Ryan “pored over [Fairstein’s] confession tapes” and she “know[s] what was done.” See *Fairstein v. Netflix*, No. 20-cv-8042, 2023 WL 6125631, at **14, 16, 19, 21-22, 25 (S.D.N.Y. Sept. 19, 2023). Plaintiff’s libel claims are proceeding against Netflix and Ava DuVernay with respect to all five scenes. Plaintiff’s libel claims are proceeding against Attica Locke with respect to the fourth scene, depicting Fairstein concealing the sock DNA evidence.
- Conspiracy to defame Plaintiff, against all three defendants. *Fairstein v. Netflix*, 2023 WL 6125631, at *29.

B. Remaining Defenses

Defendants state that the remaining defenses to be tried to the jury¹ are:

- a) Plaintiff has not met her burden of proving that any of the five scenes at issue contains a statement of fact that conveys a defamatory meaning.
- b) Plaintiff has not met her burden of proving that any of the five scenes at issue is materially false (not substantially true).
- c) Plaintiff has not met her burden of proving that any of the Defendants acted with actual malice in writing and publishing the five scenes at issue.
- d) Plaintiff has not met her burden of proving her claimed reputational and economic damages are valid and were caused by the five scenes at issue.
- e) Plaintiff has not met her burden of proving that she is entitled to punitive damages.

IV. Stipulations of Fact

Counsel certify that they met face to face on two occasions to discuss proposed stipulations of fact. The parties exchanged several draft stipulations but could not come to an agreement with respect to any stipulations of fact and, for that reason, none are included herein

V. Plaintiff's Witness List

Plaintiff may call the following witnesses at trial:

- 1. Ava DuVernay
- 2. Attica Locke
- 3. Robin Swicord
- 4. Alison Engel
- 5. Denise Martin
- 6. Joanna Wolff

¹ Defendants reserve their right to have the Court decide the issue of whether the doctrine of incremental harm or libel proof plaintiff doctrine bar Plaintiff's claims for liability as a matter of law at the end of trial.

7. Linda Fairstein
8. Elizabeth Lederer
9. Arthur Tim Clements
10. Eric Reynolds
11. Sal Blando
12. Robert Nugent
13. Christine Ball
14. Laura Rossi
15. Ariel Zwang
16. Nelson DeMille
17. Doug Bania
18. Robert J. Fisher
19. Any witnesses identified by Defendants.
20. Any witnesses called by Defendants.
21. Any impeachment and rebuttal witnesses as necessary.
22. Any custodian of records as necessary to authenticate documents.²

VI. Plaintiff's Deposition Designations

A. Robin Swicord

Pursuant to FRCP 32(a)(4)(C), Plaintiff intends to designate testimony from the deposition of Robin Swicord, taken on May 12, 2022, to be presented by video, at trial. Plaintiff originally designated testimony from Ms. Swicord's deposition on December 15, 2023. Plaintiff designated additional testimony from Ms. Swicord's deposition on February 11, 2024. In order to allow Defendants sufficient time to object to the amended designations and to counter-designate testimony in light of the amended designations, and to allow Plaintiff sufficient time to respond to Defendants' objections and counter-designations, the parties have agreed to submit the designations for Ms. Swicord no later than March 1, 2024.

B. Netflix 30(b)(6) Testimony

Pursuant to FRCP 32(a)(3), Plaintiff designates testimony from the Rule 30(b)(6) deposition of Joanna Wolff, dated May 25, 2022, to be presented by video at trial. *See* attached Exhibit A.

Plaintiff reserves the right to designate additional testimony in the event non-party witnesses listed on the parties' witness lists are unavailable to testify live at trial. Plaintiff's inclusion of any testimony and/or exhibit in the Swicord and Netflix 30(b)(6) deposition designations set forth in should not be construed as an admission that such testimony and/or exhibit is admissible if offered by Defendants, and Plaintiff expressly reserves the right to

² Plaintiff reserves the right to offer custodian affidavits in lieu of live witness testimony to authenticate documents produced or collected by nonparties.

object to Defendants' attempts to introduce any testimony and/or exhibit included in the Swicord and Netflix 30(b)(6) deposition designations.

VII. Defendants' Witness List

Defendants may call the following witnesses at trial:

1. Linda Fairstein
2. Ava DuVernay
3. Attica Locke
4. Alison Engel
5. Joanna Wolff
6. Robin Swicord
7. Berry Welsh
8. Jane Rosenthal
9. Yusef Salaam
10. Sharonne Salaam
11. Angela Cuffee Black
12. David Nocenti
13. Mickey Joseph
14. Elizabeth Lederer
15. Esther Newberg
16. Christine Ball
17. Ariel Zwang
18. Elizabeth Bradley
19. Anthony Friscia
20. Karen Pearl
21. Margery Flax
22. Donna Andrews
23. Denise Martin
24. Tony Freinberg
25. David Kaplan
26. Any witnesses identified by Plaintiff.
27. Any witnesses called by Plaintiff.
28. Any impeachment and rebuttal witnesses as necessary.
29. Any custodian of records as necessary to authenticate documents.³

³ Defendants reserve the right to offer custodian affidavits in lieu of live witness testimony to authenticate documents produced by non-parties.

VIII. Defendants' Deposition Designations

Pursuant to the September 27, 2023 Scheduling Order, Defendants Netflix, Inc., Ava DuVernay, and Attica Locke submit Deposition Designations for the following witness: Laura Rossi. See attached Exhibit B. Defendants reserve the right to revise, supplement, or withdraw these Deposition Designations based on the Court's rulings, Plaintiff's designations of deposition testimony, Plaintiff's witness and exhibit lists, evidence introduced at trial, or as otherwise deemed necessary. Defendants further reserve the right to play any affirmative designations as counter-designations and incorporate and play at trial the designations offered by Plaintiff. Defendants reserve the right to designate additional testimony in the event non-party witnesses listed on the parties' witness lists are unavailable to testify live at trial.

By submitting these Deposition Designations, Defendants do not waive any objections to the use of testimony and/or exhibits contained in the Deposition Designations or their subject matter. Defendants' inclusion of any testimony and/or exhibit within these Deposition Designations should not be construed as an admission that such testimony and/or exhibit is admissible if offered by Plaintiff, and Defendants expressly reserve the right to object to Plaintiff's attempts to introduce any testimony and/or exhibit included in these Deposition Designations.

IX. Plaintiff's Trial Exhibits

See attached Exhibit C.

Plaintiff's inclusion of any exhibit on Plaintiff's Exhibit List should not be construed as an admission that such exhibit is admissible if offered by Defendants and Plaintiff expressly reserves the right to object to Defendants' attempts to introduce any exhibit included on Plaintiff's Exhibit List at trial. Plaintiff reserves the right to use graphic aids and trial demonstratives in addition to the exhibits described in Exhibit C.

Defendants reserve the right to add additional objections to Plaintiff's exhibit list to the extent Plaintiff is unable to lay a proper foundation for an exhibit. Defendants reserve the right to further object depending on how the document is offered.

X. Defendants' Trial Exhibits

See attached Exhibit D.

Defendants' inclusion of any exhibit within Defendants' Exhibit List should not be construed as an admission that such exhibit is admissible if offered by Plaintiff, and Defendants expressly reserve the right to object to Plaintiff's attempts to introduce any exhibit included in this List. Defendants reserve the right to use graphic aids and trial demonstratives in addition to the exhibits described in Exhibit D.

Plaintiff reserves the right to add additional objections to Defendants' exhibit list to the extent Defendants are unable to lay a proper foundation for an exhibit. Plaintiff reserves the right to further object depending on how the exhibit is offered.

XI. Damages and Other Relief Sought

Plaintiff's Statement:

A. Damages

Plaintiff is seeking to recover the following damages at trial:

- a. **Reputational harm:** Due to the false and defamatory portrayal of Plaintiff in *When They See Us*, including the marketing and promotion thereof, publicity related thereto and Defendants' statements related thereto, Plaintiff has suffered, and continues to suffer, significant injury to her reputation as i) an author, ii) an attorney; and iii) consultant, because the media, viewers and members of the public have adopted the false narrative espoused in the film series as true and incessantly attacked Plaintiff's ethics and character, resulting in all aspects of her career coming to an abrupt halt. This coincided with the premiere of *When They See Us* on May 31, 2019. Plaintiff believes that an award of damages in the range of \$6,000,000 to \$8,000,000 would be fair and equitable for the negative consequences she has suffered because of Defendants' malicious intent and reckless disregard for the truth in electing to portray Plaintiff in a false and defamatory manner in the Series. Plaintiff's expert Robert J. Fisher also estimated that, if Plaintiff prevails at trial, a two-year, proactive reputation repair program will cost her approximately \$650,000 to \$700,000.
- b. **Economic Damages:** Plaintiff's expert, Doug Bania, calculated economic damages based on lost profits for Fairstein Enterprises LLC, which housed Plaintiff's publishing career. Mr. Bania concluded that, with respect to her publishing career, Plaintiff suffered economic damages in the amount of \$1,371,218.00.
- c. **Emotional Distress:** Plaintiff suffered humiliation and mental anguish resulting from the Series and the public backlash against Plaintiff arising from the Series, including death threats and threats of harm, being "cancelled," loss of her livelihood and constant attacks on her reputation.
- d. Punitive damages.

B. Injunctive Relief

Because the harm from the repetitive airing of *When They See Us* is continuing in nature, Plaintiff also seeks an injunction directing Defendants to: (a) issue a public statement correcting

the false and defamatory statements concerning Plaintiff that are contained in *When They See Us* which states that the series is a “fictionalized dramatization, comprised of scenes and dialogue that never happened and were never spoken, a product of the writers’ fertile imagination and desire to create a fictional villain, in Ms. Fairstein, for the public to hate, that never existed in reality”; (b) remove Episodes One, Two and Four of *When They See Us* from Netflix’s streaming platform, and from any other platform, service or other medium through which the film series is, or will be, viewed; (c) edit Episodes One, Two and Four of *When They See Us* so that the false and defamatory scenes depicting Plaintiff are removed; (d) place a prominent disclaimer at the beginning of each episode which states that the series is a dramatization, is not a true story, and that the characters identified by their actual names in the film series are not truthfully depicted; (e) categorize *When They See Us* only as a TV Drama on any streaming service or other medium; (f) remove all posts from their social media accounts which refer to *When They See Us* as a true, real or fact-based story; (g) remove all posts from their social media accounts, and refrain from making posts on social media, or making public statements in the future which refer to Plaintiff as responsible for the prosecution of the Central Park Jogger case; and (h) remove from their social media accounts the posts detailed at Paragraphs 153, 155, 162-63, 171-78, 180-81, 183, 187-91, 193-95, 197 and 200-218 of the Complaint.

C. Costs and Attorneys’ Fees

Plaintiff also seeks to recover costs and attorney’s fees.

Defendants’ Response:

Defendants object to Plaintiff’s requested damages including the numerous improper bases upon which she attempts to seek damages and relief. *See* Defendants’ Motion *in Limine* #2: Motion to Bifurcate and Exclude References to Punitive Damages (ECF Nos. 285-287), Defendants’

Motion *in Limine* #3: Omnibus Motion Regarding Plaintiff's Purported Experts (ECF Nos. 288-292), and Defendants' Proposed Jury Instructions at Instructions 27-28 (ECF No. 332).

Dated: February 16, 2024

Respectfully Submitted,

By: /s/ Kara L. Gorycki

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Subject to
Court's Order of
May 23, 2024
on limitation on
presentation of
evidence and
other matters.
SO ORDERED
J. M. [Signature]
JSD
5-23-24

By: /s/ Bart H. Williams

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CERTIFICATE OF SERVICE

I hereby certify that on February 16, 2024, a true and correct copy of the foregoing was served by CM/ECF on all counsel of record.

/s/ Kara L. Gorycki
Kara L. Gorycki

EXHIBIT A

Deposition of Joanna Wolff, taken May 25, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Joanna Wolff	Plaintiff Affirmatives	5	3	5	5			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	7	7	7	8			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	7	11	7	17			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Defense Counter	8	23	8	25			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	9	2	10	16			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	11	8	12	4			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Defense Counter	12	21	12	23			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Joanna Wolff, taken May 25, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Joanna Wolff	Plaintiff Affirmatives	12	24	13	16			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	14	18	15	14			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Defense Counter	15	15	15	20			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Defense Counter	16	16	16	18			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Defense Counter	16	22	17	4			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	17	5	17	18			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Joanna Wolff, taken May 25, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Joanna Wolff	Plaintiff Affirmatives	17	25	18	2	Vague & Ambiguous, Calls for Speculation (FRE 611). The term "role" is vague, and as such, the question appears to require the witness to speculate as to the writers' state of mind.	The question is neither ambiguous nor calls for speculation as evidenced by the witness's answer. The Series is a docudrama, the role is the character of Linda Fairstein.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	18	23	18	25	See prior objection.	The question is neither ambiguous nor calls for speculation as evidenced by the witness's answer. The Series is a docudrama, the role is the character of Linda Fairstein	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	19	21	21	6			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	21	8	22	3			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	22	6	22	15			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	22	18	24	20			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Defense Counter	24	21	25	17			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Joanna Wolff, taken May 25, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Joanna Wolff	Plaintiff Affirmatives	25	18	25	18			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	25	24	26	19	26:19. Lacks Foundation (FRE 602); Asked & Answered (FRE 403). Leading question that provides the witness with the answer. The witness already answered that she was unsure of the exact date at 26:17-19.	Leading questions are allowed when questioning an adverse witness. FRE 611(c)(2) The question was asked to refresh the witness's recollection. The question asked is a different question.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	26	21	28	15	See prior objections.	Leading questions are allowed when questioning an adverse witness. FRE 611(c)(2)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	28	20 [start at "Were"]	29	22			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	29	24	30	8	30:7-8. Argumentative (FRE 611); Asked & Answered (FRE 403). Question asked in a leading format that presupposes an answer. The witness was previously asked and responded as to whether Color of Change is part of Participant Media at 29:25-30:3.	Leading questions are allowed when questioning an adverse witness. FRE 611(c)(2). The question is not a leading question. The question asked is different than the previous question. Whether the witness heard Color of Change referred to as an "arm"	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Joanna Wolff, taken May 25, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
							versus whether Color of Change was part of Participant Media.	
Joanna Wolff	Plaintiff Affirmatives	30	10	31	2	See prior objection.	Leading questions are allowed when questioning an adverse witness. FRE 611(c)(2) There are no leading questions in this designation.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	31	9	31	21			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	32	18	32	21			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	32	23	33	6			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	33	8	34	2			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Joanna Wolff, taken May 25, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Joanna Wolff	Plaintiff Affirmatives	56	23	58	15	58:9-13. Lacks Personal Knowledge (FRE 602); Calls for Speculation (FRE 611). The witness lacks the requisite knowledge to testify regarding the casting announcement and Ms. DuVernay's contributions to it, as evidenced by her testimony at 59:11-13 that she was not at the company at the time.	This is a 30(b)(6) deposition that Plaintiff may use at trial as a 30(b)(6) deposition. The witness need not have personal knowledge. FRCP 32(a)(3). <i>See Abbott Labs. v. Feinberg</i> , 202 WL 7706571, at *1 (S.D.N.Y. Oct. 15, 2020). The FRE 611 objection is waived because no objection was posed at the deposition. FRCP 32(d)(3)(B).	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	58	19	61	21	58:19-59:13. Lacks Personal Knowledge (FRE 602); Calls for Speculation (FRE 611). The witness lacks the requisite knowledge to testify regarding the casting announcement and Ms. DuVernay's contributions to it, as evidenced by her testimony at 59:11-13 that she was not at the company at the time. 61:18-21. Calls for Speculation (FRE 611). Counsel's question requires the witness to opine on Ms. DuVernay's internal thoughts and reasoning.	This is a 30(b)(6) deposition that Plaintiff may use at trial as a 30(b)(6) deposition. The witness need not have personal knowledge. FRCP 32(a)(3). <i>See Abbott Labs. v. Feinberg</i> , 202 WL 7706571, at *1 (S.D.N.Y. Oct. 15, 2020). The FRE 611 objection is waived because no objection was posed at the deposition. FRCP 32(d)(3)(B).	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	61	23	62	21	See prior objection.	This is a 30(b)(6) deposition that Plaintiff may use at trial as a 30(b)(6) deposition. The witness need not have personal knowledge. FRCP 32(a)(3). <i>See Abbott Labs. v. Feinberg</i> , 202 WL 7706571, at *1 (S.D.N.Y. Oct. 15, 2020).	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Joanna Wolff, taken May 25, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
							The question is asking about a statement that Ms. DuVernay made in the exhibit.	
Joanna Wolff	Plaintiff Affirmatives	63	3	65	3	As to Exhibit 7 and related testimony. Hearsay (FRE 802). Exhibit 7 contains out-of-court statements offered for their truth, namely that Tribeca and Participant had concerns about Linda Fairstein.	Exhibit 7 is not hearsay. FRE 801(d)(2). The email is submitted as evidence that Netflix employees discussed concerns about the unfavorable portrayal of Plaintiff in the Series.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Joanna Wolff, taken May 25, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Joanna Wolff	Plaintiff Affirmatives	65	10	66	3	<p>As to Exhibit 7 and related testimony. Hearsay (FRE 802). Exhibit 7 contains out-of-court statements offered for their truth, namely that Tribeca and Participant had concerns about Linda Fairstein.</p> <p>65:10-16. Misstates the Record (FRE 611). Phrasing of the question presumes that documents were being released, when the email being discussed only says Fairstein was "pushing" for documents to be released.</p>	<p>Exhibit 7 is not hearsay. FRE 801(d)(2). The email is submitted as evidence that Netflix employees discussed concerns about the unfavorable portrayal of Plaintiff in the Series</p> <p>The FRE 611 objection is waived because no objection was posed at the deposition. FRCP 32(d)(3)(B).</p> <p>65:10-16 correctly describes the contents of the email.</p>	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	66	16	67	17	<p>See prior objection.</p> <p>67:10-14. Lacks Relevance (FRE 402). The witness's request to see a specific document in response to counsel's question is not probative of any issue in this case.</p>	<p>Exhibit 7 is not hearsay. FRE 801(d)(2). The email is submitted as evidence that Netflix employees discussed concerns about the unfavorable portrayal of Plaintiff in the Series</p> <p>How the witness answered the specific question about Netflix's public relations strategy is relevant to the assessment of the competence and credibility of the witness.</p>	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	68	2	68	17			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

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Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Joanna Wolff	Plaintiff Affirmatives	68	20	72	2	<p>69:2-4. Argumentative, Misstates the Record (FRE 611). Question improperly synthesizes the contents of the document being reviewed; witness corrected the premise on the record.</p> <p>71:10-72:2. Argumentative (FRE 611). The questions posed are framed in an argumentative manner that takes the phrase "true story" out of context.</p> <p>72:2. Argumentative (FRE 611), Asked & Answered (FRE 403). The witness already responded to the question of whether or not the Series is a "true story" in the prior Q&A. Any objection as to the form of the witness's original answer was waived. See FRCP 32(d)(3)(B).</p>	<p>69:2-4: The FRE 611 objection is waived because no objection was posed at the deposition. FRCP 32(d)(3)(B). The question includes a direct statement from the document.</p> <p>71:10-71:25: The FRE 611 objection is waived because no objection was posed at the deposition. FRCP 32(d)(3)(B). The question is not argumentative, it asks whether the Series is a true story. There is no "context" in which that question need be posed. "True story" is a plainly understood term.</p> <p>72:2: The question is asked a second time because the witness's answer was not responsive to the first question posed.</p>	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	72	5	72	6	See prior objection.	See prior responses.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	72	7	72	7	72:7. Lacks Relevance (FRE 402); Argumentative, Vague & Ambiguous (FRE 611). Question asks about every single scene in the Series (overbroad and not relevant) and asks for a generalization of the truthfulness of every scene.	The question is relevant to Netflix's decision to promote the Series as a true story as set forth in the colloquy.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

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Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Joanna Wolff	Plaintiff Affirmatives	72	25	73	5	72:25-73:3. See prior objection to the question being responded to in this designation.	The “prior objection” is inapplicable to this designation. It is unclear what is being objected to. FRE 611 objections are waived because no objection was posed at the deposition. FRCP 32(d)(3)(B).	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Defense Counter	73	6	73	15	FRE 402 -the witness’ personal beliefs about whether the Five are guilty or innocent is not probative of any issue in this case.	The question posed (“If the series is told from the [F]ive’s perspective, why was it positioned as five hours of the truth, according to this PR document?”) is asking about the positioning of the Series, which is squarely at issue in this case.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Defense Counter	73	16	73	16			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Defense Counter	73	20	73	25	FRE 402 – whether Netflix believes in its content or was proud to give the Five a platform is not probative of any issue in this case.	The designated testimony is responsive to a line of questions about the positioning of the Series, which is squarely at issue in this case.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	74	2	74	3	74:2-3. Argumentative, Vague & Ambiguous (FRE 611); Asked & Answered (FRE 403). Asking whether "the series is the truth" is overbroad and vague; "the truth" is a subjective term. The repeated questioning on whether the Series is "the truth" is improper.	The “truth” is not a subjective term, it is in accordance with fact or reality. Netflix marketed and promoted the Series as a true story. The questions posed to the witness ask whether different things were true in connection with Netflix’s public statements that the Series was the truth.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

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Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Joanna Wolff	Plaintiff Affirmatives	74	14	78	22	<p>See prior objection.</p> <p>74:17-75:4. Lacks Personal Knowledge (FRE 602). Does not lay foundation as to how Ms. Wolff/Netflix would know whether others made those public comments.</p> <p>75:5-9. Asked & Answered (FRE 403). The witness answered the question at 74:17-21.</p> <p>76:4-9. Calls for Speculation, Vague & Ambiguous (FRE 611). Vague as to the use of the term "challenge." Requires the witness to speculate as to "Netflix's" views.</p> <p>77:4-20. Lacks Personal Knowledge (FRE 602); Calls for Speculation (FRE 611). Questions ask the witness to speculate on Ms. DuVernay's state of mind when writing the document.</p> <p>77:21-24. Argumentative (FRE 611). Question assumes the premise that Netflix set out to discredit Fairstein.</p>	<p>74:14-75:18: This line of questioning is based on the witness's knowledge that people other than Plaintiff expressed views that the Five are guilty. The question asked at 75:5-9 is intended to clarify the witness's prior testimony.</p> <p>76:4-9: The FRE 611 objection is waived because no objection was posed at the deposition. FRCP 32(d)(3)(B). The witness was prepared to testify on behalf of Netflix at this 30(b)(6) deposition.</p> <p>77:4-20: This is a Netflix document produced from Netflix's files. It does not speak to DuVernay's state of mind but Netflix's strategy and the reasoning behind it. The FRE 611 objection is waived because no objection was posed at the deposition. FRCP 32(d)(3)(B).</p> <p>77:21-24: This objection is waived because no objection was posed at the deposition. FRCP 32(d)(3)(B). There is no assumption in this question.</p>	<p><input type="checkbox"/> Sustained</p> <p><input type="checkbox"/> Overruled</p>

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Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Joanna Wolff	Plaintiff Affirmatives	79	10	79	17	79:10-17. Vague & Ambiguous (FRE 611). Counsel's question is vague as to who may have held such a concern.	This objection is waived because no objection was posed at the deposition. FRCP 32(d)(3)(B). The entire line of questioning concerns Netflix's public relations strategy and the witness is testifying on behalf of Netflix.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	80	12	80	21			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	81	4	81	20			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	81	24	83	21	As to Exhibit 9 and related testimony. Hearsay/Double Hearsay (FRE 802). The document that is Exhibit 9 contains out-of-court statements being offered for their truth, namely that the addition of dialogue to the teaser added "additional context around Linda/the system's agenda against these boys." There are two layers of hearsay in that particular statement given that it was originally discussed at a prior meeting.	This is not hearsay. FRE 801(d)(2). The email concerns actions that were taken to modify the Series teaser	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	84	2	84	15			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

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Joanna Wolff	Plaintiff Affirmatives	85	8	86	6			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	86	11	86	13			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	87	9	88	12	<p>As to Exhibit 10 and related testimony. Lacks Personal Knowledge and Foundation (FRE 602, 901). The witness was unable to identify whether the document that is Exhibit 10 came from "some sort of messaging system internal to Netflix." See 87:8.</p> <p>As to Exhibit 10 and related testimony. Hearsay (FRE 802). The document contains out-of-court statements ("Ava threw down, she wants Fairstein, so let's show her how it feels.") being offered for their truth, namely, that Ms. DuVernay "insisted" that the Fairstein voice-over be included in the teaser.</p>	<p>Netflix produced Exhibit 10 from the file of Netflix employee Denise Martin so the authentication is unwarranted. The witness is a 30(b)(6) witness who was prepared to answer questions about the Series date announcement.</p> <p>The document and testimony are not hearsay. FRE801(d)(2). The document is offered to show that Netflix agreed to include Fairstein in the Series teaser and employees expressed a malicious intent intent in doing so.</p>	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	88	18	88	19			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

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Joanna Wolff	Plaintiff Affirmatives	88	25	89	9	As to Exhibit 11 and related testimony. Hearsay (FRE 802). Exhibit 11 contains out-of-court statements being offered for their truth, including that certain pulls would need to be evaluated for their usability.	Exhibit 11 is not hearsay. FRE 801(d)(2). Plaintiff has designated the testimony concerning usability.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	91	6	91	24			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	92	4	93	9	As to Exhibit 12 and related testimony. Hearsay/Double Hearsay (FRE 802). Exhibit 12 contains out-of-court statements offered for their truth, namely, that Netflix had concerns about Fairstein's reaction to the teaser video. The designated testimony contains a second level of hearsay, indicating what "Clarissa said." 93:7-9. Misstates Testimony (FRE 611). Question asks how Fairstein's strong reaction could "detract from the men's story;" previous answer at 93:5-6 was that it could detract from <i>the goal of telling</i> their story.	Exhibit 12 is not hearsay. FRE 801(d)(2). The email containing "Clarissa said" is also a present sense impression, or what Martin "remember[s] from the call." FRE 803(1). 93:7-9: The witness's answer indicates that she understood the question. Counsel was not quoting the witness in the question asked.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	93	11	94	9	93:14-23, 94:7-9. Relevance (FRE 402). The witness's testimony that she "does not recall" is not likely to make any fact of consequence more		<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

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						or less probable, and as such, the designated testimony lacks relevance.		
Joanna Wolff	Plaintiff Affirmatives	94	14	94	16	See prior objection. 94:14-16. Argumentative, Compound Question (FRE 611). Framing of Netflix's decision as "appeasing" Ms. DuVernay is argumentative, and question asks about two things: appeasing DuVernay and including the voiceover.	See prior response. The question is not argumentative given that Netflix employees were discussing acquiescing to DuVernay in Exhibit 12. This is not a compound question – the appeasement relates to the Series teaser.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	94	20	96	4	See prior objection.	See prior response.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	96	13	96	16	96:13-16. Vague & Ambiguous (FRE 611). Request for the "ultimate reason" for a decision is vague, and also presupposes that there was a predominant reason for a particular decision.	The question relates to Exhibit 12 in which Netflix employees weigh two different reasons for going with the Fairstein voiceover.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

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Joanna Wolff	Plaintiff Affirmatives	96	20	97	17	See prior objection. 97:3-13. Hearsay (FRE 802). Question calls for hearsay (what Ms. DuVernay "express[ed]" to Netflix's marketing team). 97:14-17. Asked & Answered (FRE 403). The witness already responded to the question, including at 96:21-97:2.	See prior response. 97:3-13: This is not hearsay. FRE 801(d)(2)(E). This goes to the strategy behind using Fairstein in the trailer. 97:14-17: This question was not previously asked.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	97	20	98	8	See prior objection.	See prior response.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	99	8	100	9	See prior objection. 99:8-21. Lacks Relevance (FRE 402), Argumentative (FRE 611). Counsel's questions alone are not proper testimony, and designating them where the witness did not substantively respond is argumentative. 100:6-9. Misstates Evidence (FRE 611). Extrapolates from the word "conspiracy" in the exhibit to a broader "there was a conspiracy involved in the case against the five."	The witness answers the question at 99:21. The question at 99:19-20 concerns the exhibit that was reviewed with the witness at 99:8-17. 100:6-9: The objection raised here is trying to impose counsel's interpretation of the evidence. The question posed to the witness is straightforward, to get at what was meant by conspiracy in the exhibit being discussed.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

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Joanna Wolff	Plaintiff Affirmatives	100	11	100	17	See prior objection. 100:15-17. Argumentative (FRE 611). Assumes there was a single conspiracy that Netflix incorporated into its marketing strategy, rather than, e.g., a theme or feeling of conspiracy.	See prior response. There is only one “conspiracy” referenced in the document being discussed. Ex. 12.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	100	21	101	3	See prior objection.	See prior response.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	101	5	101	20	See prior objection. 101:15-18. Lacks Relevance (FRE 402), Argumentative (FRE 611). The witness's request to be directed to the relevant portion of the document is not relevant to any issue in this case. Counsel's questions alone are not proper testimony, and designating them where the witness did not substantively respond is argumentative.	See prior response. The witness's request to see the copy that is being asked about is relevant to her competence and credibility.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	101	25	103	17	As to Exhibit 13 and related testimony. Hearsay (FRE 802). Exhibit 13 contains out-of-court statements being offered for their truth (i.e., the way in which the teaser video was posted to social media).	The communications in Exhibit 13 are not hearsay. FRE 801(d)(2)(A), (D), (E). It was shown to the witness to refresher recollection on the copy that was used with the film teaser on social media.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

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Joanna Wolff	Plaintiff Affirmatives	103	22	104	6			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	104	15	104	23			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	106	3	106	4			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	106	10	107	8			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	107	12	109	10	108:23-109:3. Compound (FRE 611). Unclear if question refers to South African Twitter users or Twitter users in South Africa.	The FRE 611 objection is waived because no objection was posed at the deposition. FRCP 32(d)(3)(B).	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	109	16	110	5			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	111	7	111	9			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

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Joanna Wolff	Defense Counter	112	17	112	22			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	113	21	113	23			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	113	25	114	10			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	114	14	114	21			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	115	5	115	6			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	115	8	115	18			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

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Joanna Wolff	Plaintiff Affirmatives	115	23	116	8	As to Exhibit 17 and related testimony. Hearsay (FRE 802). The document contains out-of-court statements being offered for their truth, namely, that the goal of the Series was "to leave people emotionally charged, angry and activated to not only watch the series but to talk about its larger themes and seek change."	Exhibit 17 is not hearsay. FRE801(d)(2)(A),(D),(E)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	116	16	118	19	See prior objection. 118:14-17. Lacks Relevance (FRE 402), Argumentative (FRE 611). Counsel's questions alone are not proper testimony, and designating them where the witness did not substantively respond ("I would have to look at the copy.") is argumentative.	The witness's response to the question goes to competence and credibility. The FRE 611 objection is waived because no objection was posed at the deposition. FRCP 32(d)(3)(B). The question is not argumentative in any event.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	119	4	119	18			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	119	25	122	13	121:9-11. Lacks Relevance (FRE 402), Argumentative (FRE 611). Counsel's questions alone are not proper testimony, and designating them where the witness did not substantively respond ("I would have to look back.") is argumentative.	The objection misstates the testimony at 121:9-11. The FRE 611 objection is waived because no objection was posed at the deposition. FRCP 32(d)(3)(B).	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

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Joanna Wolff	Plaintiff Affirmatives	123	2	123	14			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	123	18	124	13	124:12-13. Argumentative (FRE 611), Asked & Answered (FRE 403). Asked and answered at 124:7-11.	The question is asking the witness to clarify what is in the exhibit being discussed.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	124	17	124	21	See prior objection.	See prior response.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	124	24	125	3			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	132	8	132	12			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	139	18	139	25	As to Exhibit 23 and related testimony. Hearsay (FRE 802). Exhibit 23 contains out-of-court statements being offered for their truth, including that the publicity team had certain opinions and hypotheses regarding the 20/20 program.	Exhibit 23 is not hearsay FRE 801(d)(2)(A), (D). Ms. Abramson's notes also fall within an exception to the hearsay rule. FRE 803(1).	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

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Joanna Wolff	Plaintiff Affirmatives	140	6	140	6			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	140	8	140	14			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	140	16	140	21			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	141	14	141	17	Calls for Speculation (FRE 611). Asks witness to speculate about viewers' state of mind.	The question asks what the publicity team concluded about the 20/20 program.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	141	19	141	22	141:19-20. See prior objection to question being answered.	See prior response. The question in this designation asks nothing about viewers.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	141	24	142	3			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

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Joanna Wolff	Defense Counter	142	4	142	6			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Defense Counter	142	8	142	8			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	142	9	142	17			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	143	20	143	21			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	144	3	145	19	145:4-8, 16-19. Asked & Answered (FRE 403). The question of whether Netflix characterized the Series as a true story has been asked & answered, e.g., 72:2-6.	Prior questions asked whether the Series is a true story, the questions, here, pertain to the concerns raised by Netflix. The question at 145:4-8 is different than the question asked at 145:16-19.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	145	22	146	3	See prior objection.	See prior response.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

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Joanna Wolff	Plaintiff Affirmatives	146	12	147	17	See prior objection. 147:8-17. Asked & Answered (FRE 403). Question was asked and answered at 146:22-147:7. Any objection as to the form of the witness's original answer was waived. See FRCP 32(d)(3)(B).	See prior response. The question is asked more than once because the witness's answers are not responsive.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	147	20	148	14	See prior objection. 148:11-14. Argumentative (FRE 611). Testifies for the witness by assuming what the witness meant in an answer. Any objection as to the form of the witness's original answer was waived. See FRCP 32(d)(3)(B).	See prior response. The question does not assume. The question asks what is meant by the document because the witness's answers are not responsive.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	148	16	149	10	See prior objection. 148:19-24. Argumentative (FRE 611). Mischaracterizes the document and frames the question in an argumentative manner.	See prior response. The objection is waived because it was not posed at the deposition, FRCP 32(d)(3)(B). The question asks whether Netflix employed a particular communications strategy.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	149	15	149	23			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

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Joanna Wolff	Plaintiff Affirmatives	150	7	150	11	150:7-11. Asked & Answered (FRE 403), Argumentative (FRE 611). Use of "silence the voices" is an argumentative framing. The witness already explained what was meant by the document at 148:19-149:7, 149:15-150:6.	The use of "silence" in this question is different than previous questions.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	150	13	151	12	See prior objection. 150:14-23. Asked & Answered (FRE 403). The witness already answered the question at 148:25-149:7. Any objection as to the form of the witness's original answer was waived. See FRCP 32(d)(3)(B).	See prior response. 150:14-23. The objection is waived because it was not posed at the deposition, FRCP 32(d)(3)(B). The question asked is different than previous questions and necessitated by the witness's unresponsive answers.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	152	4	153	12	See prior objection.	See prior response.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	153	14	154	4			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Joanna Wolff, taken May 25, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Joanna Wolff	Plaintiff Affirmatives	154	11	155	15	<p>155:4-7. Asked & Answered (FRE 403). The witness already responded to the question at 154:21-155:3.</p> <p>155:13-15. Vague & Ambiguous (FRE 611). "The manner in which Ms. Fairstein is portrayed" is a vague premise for the question.</p>	<p>155:4-7: The objection is waived because it was not posed at the deposition, FRCP 32(d)(3)(B). The question why was the information was flagged as a potential issue is different than why was it included in the plan.</p> <p>155:13-15: The question is not vague, as evidenced by the witness's response. It also relates directly to the reference of the "portrayal" in the exhibit being discussed.</p>	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	155	17	156	23	<p>See prior objection.</p> <p>156:20-23. Asked & Answered (FRE 403). The witness already answered the question at 155:24-156:19.</p>	<p>See prior response.</p> <p>The question of an issue being flagged versus why the particular description was included in the document are separate questions.</p>	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	157	2	157	5	See prior objection.	See prior response.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	158	9	158	10			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	159	20	159	21			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Joanna Wolff, taken May 25, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Joanna Wolff	Plaintiff Affirmatives	160	6	160	24	160:20-22. Lacks Relevance (FRE 402). Counsel's question, without a substantive response from the witness ("I don't recall."), lacks relevance.	The witness's answer goes to the competence and credibility of the witness.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	161	5	164	12	As to Exhibit 26 and related testimony. Hearsay (FRE 802). The document that is Exhibit 26 contains out-of-court statements being offered for their truth (i.e. that they were "continuously fine-tuning [the] reactionary plan while monitoring the ongoing customer feedback" and that anger towards Linda Fairstein was a "top conversation driver" for the Series).	Exhibit 26 is not hearsay. FRE 801(d)(2)(D). It is also excepted under FRE 803(1).	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	166	21	167	2	None		<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	167	8	168	5	As to Exhibit 28 and related testimony. Hearsay (FRE 802). Exhibit 28 contains out-of-court statements being offered for their truth (i.e. that Color of Change was running a campaign against Linda Fairstein).	The email referenced in the objection is offered to demonstrate that Netflix received notice from Color of Change that it was running a campaign. Exhibit 28 also reflects that Netflix was considering getting involved in events against Fairstein. FRE 801(d)(2)(D).	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Joanna Wolff, taken May 25, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Joanna Wolff	Plaintiff Affirmatives	168	22	169	19	169:3-9. Mischaracterizes Evidence (FRE 611). Witness corrects the record after the question assumes that Netflix's question was directed at Color of Change.	The objection is waived because it was not posed at the deposition, FRCP 32(d)(3)(B). The witness clarifies that Netflix asked the question to Color of Change and a producer.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	169	20	169	21			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	170	2	171	24			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Plaintiff Affirmatives	172	2	172	18			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Defense Counter	172	19	172	23			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Joanna Wolff	Defense Counter	173	3	173	8			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

EXHIBIT B

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Rossi, Laura	Defendants' Affirmative	7	24	7	25			
Rossi, Laura	Defendants' Affirmative	12	3	12	6			
Rossi, Laura	Defendants' Affirmative	20	10	20	23			
Rossi, Laura	Defendants' Affirmative	21	7	22	10			
Rossi, Laura	Defendants' Affirmative	23	5	23	17			
Rossi, Laura	Defendants' Affirmative	24	25	25	3			

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Rossi, Laura	Defendants' Affirmative	25	5	25	14			
Rossi, Laura	Defendants' Affirmative	25	25	27	17			
Rossi, Laura	Defendants' Affirmative	27	22	28	11			
Rossi, Laura	Defendants' Affirmative	28	13	28	15			
Rossi, Laura	Defendants' Affirmative	28	20	29	12			
Rossi, Laura	Defendants' Affirmative	30	8	30	15			

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Rossi, Laura	Defendants' Affirmative	30	17	30	20			
Rossi, Laura	Defendants' Affirmative	31	10	31	11	FRE 611: The question is vague	The question as to how the witness was paid is straightforward. The question is also further clarified in the following designation, where the examiner asks who paid the witness.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	31	13	31	16	31:13: FRE 611 – the witness's question is not testimony.	This answer and the previous question provide necessary context to 31:14-16.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	38	3	38	5			
Rossi, Laura	Defendants' Affirmative	38	7	38	7			
Rossi, Laura	Defendants' Affirmative	38	17	39	13			

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Rossi, Laura	Defendants' Affirmative	39	18	39	19	FRE 611: Vague, compound question.	The question as to whether the witness ever got to know Ms. Fairstein is straightforward, and in any event, was clarified at 39:23.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	39	21	39	25	39:23 FRE 611: This is not a question.	See prior response and designation, which contains the original question. The witness asked for clarification, which the examiner then provided.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	40	10	40	23	40:18-23: FRE 602 Lacks foundation. FRE 611, Argumentative, Compound.	FRE 602: The witness has appropriate foundation, as evidenced by her testimony at 40:10-17 that she knows what the Central Park Jogger case is and that it is a case that happened in New York City involving a rape in Central Park. FRE 611: The question is neither compound nor argumentative. The examiner is establishing a shorthand reference for the prosecution of the Five, which the witness testified she understood.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Rossi, Laura	Defendants' Affirmative	40	25	40	25			
Rossi, Laura	Defendants' Affirmative	41	3	41	10			
Rossi, Laura	Defendants' Affirmative	42	12	42	17			
Rossi, Laura	Defendants' Affirmative	44	9	44	20	<p>44:16-20: FRE 602, Lacks Foundation. FRE 611, Argumentative.</p> <p>FRE 402, FRE 403: Whether the witness had any awareness of the civil action in 2012 is not relevant to any issue in this case. This testimony would confuse the issues and waste time.</p>	<p>FRE 602: The witness has the requisite knowledge, as evidenced by her testimony at 41:3-10 that Ms. Ball told her about Ms. Fairstein's involvement in the Central Park Jogger case in 2012.</p> <p>FRE 611: The line of questioning is not argumentative, but rather is seeking details about the witness's knowledge of Ms. Fairstein's reputation in 2012 and generally.</p>	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
							FRE 402/403: The testimony is relevant to Ms. Fairstein's reputation and damages, which are at issue in this case. The testimony also goes to Ms. Rossi's credibility as a witness, which the jury is entitled to determine.	
Rossi, Laura	Defendants' Affirmative	45	2	45	10			
Rossi, Laura	Defendants' Affirmative	46	25	47	2	<p>Exhibit 1 – FRE 402, an email about unspecified comments on Plaintiff's social media account in 2012 lacks relevance to any issue in this case. If it were relevant it is more prejudicial than probative. FRE 403.</p> <p>FRE 802 Exhibit 1 also contains hearsay, including the witness's and Plaintiff's out of court statements</p>	<p>FRE 402/403: The fact that there were negative comments about Ms. Fairstein and her involvement in the Central Park Jogger case online for many years prior to the release of the Series is highly relevant to damages and causation. Ms. Fairstein put her reputation at issue by bringing a defamation lawsuit. Unfavorable evidence pertaining to her tarnished reputation pre-Series is not substantially more prejudicial than probative.</p>	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
							FRE 802: Ms. Fairstein's out-of-court statements are statements of a party opponent. The emails also constitute business records. See 47:20-48:5 (establishing that in the regular course of their relationship as publicist/client, the two regularly communicated by email).	
Rossi, Laura	Defendants' Affirmative	47	20	48	3	See objection above.	See response above.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	48	5	48	14	See objection above	See response above.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	48	19	48	21	FRE 402 the witness's speculation about what she viewed on Plaintiff's social media account in 2012 is not relevant to any issue in this action.	FRE 402: The fact that there were negative comments about Ms. Fairstein and her involvement in the Central Park Jogger case online for many years prior to the release of the Series is highly relevant to damages and causation.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Rossi, Laura	Defendants' Affirmative	50	7	51	17	<p>FRE 402, testimony concerning an email about unspecified comments on Plaintiff's social media account in 2012 lacks relevance to any issue in this case. If it were relevant it is more prejudicial than probative. FRE 403.</p> <p>FRE 802 This testimony about Exhibit 1 also contains hearsay, including the witness's and Plaintiff's out of court statements</p>	<p>FRE 402/403: The fact that there were negative comments about Ms. Fairstein and her involvement in the Central Park Jogger case online for many years prior to the release of the Series is highly relevant to damages and causation. Ms. Fairstein put her reputation at issue by bringing a defamation lawsuit. Unfavorable evidence pertaining to her tarnished reputation pre-Series is not substantially more prejudicial than probative.</p> <p>FRE 802: Ms. Fairstein's out-of-court statements are statements of a party opponent. The emails also constitute business records. See 47:20-48:5 (establishing that in the regular course of their relationship as publicist/client, the two regularly communicated by email).</p> <p>Should the Court disagree with the above, Defendants would offer the exhibit not for truth</p>	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
							of the matter asserted, but for the effect on the listener (Ms. Fairstein). The email put Ms. Fairstein on notice/made her aware of the negative comments online about her/her involvement in the Central Park Jogger case.	
Rossi, Laura	Defendants' Affirmative	52	11	52	14	FRE 402 – The witness's familiarity with the Ken Burns' documentary is not relevant to any issue in this action.	The witness's familiarity with the Ken Burns documentary and the impact the film had on Ms. Fairstein's reputation prior to <i>When They See Us</i> is highly relevant to causation and damages, two of the key issues in this case. Moreover, counsel is establishing foundation for the line of questioning that follows.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	52	23	54	7	FRE 402 , testimony concerning an email about unspecified comments on Plaintiff's social media account in 2012 lacks relevance to any issue in this case. If it were relevant it is more prejudicial than probative. FRE 403 .	FRE 402/403: The fact that there were negative comments about Ms. Fairstein and her involvement in the Central Park Jogger case online for many years prior to the release of the Series is highly relevant to damages and causation. Ms. Fairstein put her reputation at	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
						FRE 802 This testimony about Exhibit 1 also contains hearsay, including the witness's and Plaintiff's out of court statements	<p>issue by bringing a defamation lawsuit. Unfavorable evidence pertaining to her tarnished reputation pre-Series is not substantially more prejudicial than probative.</p> <p>FRE 802: Ms. Fairstein's out-of-court statements are statements of a party opponent. The emails also constitute business records. See 47:20-48:5 (establishing that in the regular course of their relationship as publicist/client, the two regularly communicated by email). The quoted portion of the email is also not being offered for its truth (i.e. that Ms. Rossi felt bad or that she wish she didn't have to show Ms. Fairstein the comments), but rather to show the regularity of negative comments related to Ms. Fairstein's role in the prosecution of the Five.</p>	

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Rossi, Laura	Defendants' Affirmative	54	14	54	24	See objections above.	See responses above.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	57	9	57	13	See objections above.	See responses above. This designation is also not hearsay.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Plaintiff's Counter	58	14	58	23			
Rossi, Laura	Defendants' Affirmative	58	24	59	3	FRE 602 – the witness lacks personal knowledge about Plaintiff's "role" FRE 611 Argumentative, Compound	FRE 602: "Role" is not used in this designation. The witness has requisite personal knowledge regardless. Ms. Rossi testified that she became aware that Ms. Fairstein was the head of the sex crimes unit in the Manhattan DA's Office. See 42:6-10. FRE 611: The question is not compound, and asking whether the witness understood Ms. Fairstein's supervisory position is not argumentative.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Rossi, Laura	Defendants' Affirmative	59	6	59	10	<p>See objection</p> <p>FRE 602 – the witness lacks personal knowledge about Plaintiff's "role"</p> <p>59:8-10: FRE 611 Vague, Argumentative, Compound</p>	<p>FRE 602: "Role" is not used in this designation. The witness has requisite personal knowledge regardless. Ms. Rossi testified that she became aware that Ms. Fairstein was the head of the sex crimes unit in the Manhattan DA's Office. See 42:6-10.</p> <p>FRE 611: The question is not compound, and asking whether the witness understood that Ms. Fairstein was a high ranking public official is neither argumentative nor vague.</p>	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	59	13	59	13	See objections above	See responses above.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	61	21	61	24	FRE 402: witness's awareness of the vacatur is not relevant to any issue in this case.	The witness's knowledge of the vacatur provides important context to various topics discussed in this deposition, such as Ms. Fairstein's reputation pre-Series and the website discussed in the deposition.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Rossi, Laura	Defendants' Affirmative	62	17	62	20	<p>FRE 602 Lacks foundation</p> <p>FRE 611 Argumentative, Compound</p> <p>FRE 402 the witness's awareness of this topic is not relevant to any issue in this case.</p>	<p>FRE 602: The witness has requisite knowledge, as evidenced by her response that she is aware the convictions were vacated and why. Any foundational issues are cured by the witness's testimony at 62:22-63:6.</p> <p>FRE 611: Asking the witness whether she is aware of a well-known fact (that the convictions were vacated after Matias Reyes came forward) is not argumentative.</p> <p>FRE 402: The witness's knowledge of the vacatur provides important context to various topics discussed in this deposition, such as Ms. Fairstein's reputation pre-Series and the website discussed in the deposition.</p>	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Rossi, Laura	Defendants' Affirmative	62	22	63	17	FRE 402 the witness's awareness of this topic and how she learned about it is not relevant to any issue in this case.	See response above.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	63	23	64	7	FRE 402- whether the witness viewed the videos being asked about is not relevant to any issue in this case.	FRE 402: Whether the witness viewed the videos provides helpful context as to numerous lines of questioning in this deposition, including the creation of the website discussed in the deposition.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	64	12	64	15	FRE 402 this witness's viewing of the videos in connection with the matter being discussed is not relevant to any issue in this case.	See response above.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	65	7	66	15	FRE 602 – Lack of Foundation, Lack of Personal Knowledge. The witness testified that she did not know what specifically is being discussed. FRE 802- Exhibit 2 and related testimony contains hearsay.	FRE 602: Exhibit 2 is an email chain between Ms. Rossi and Ms. Fairstein, and the witness identified it as such. See 65:13-15 (“Q. Perfect. Can you tell me is that an e-mail between you and Ms. Fairstein? A. Yes, it is.”). The witness's claim not to recall the content of the email goes to her credibility.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
							FRE 802: Ms. Fairstein's out-of-court statements are statements of a party opponent. The emails also constitute business records. <i>See</i> 47:20-48:5 (establishing that in the regular course of their relationship as publicist/client, the two regularly communicated by email). The emails are also not being offered for their truth, but to show notice/knowledge of frequent negative commentary on Twitter as to Ms. Fairstein's role in the case.	
Rossi, Laura	Defendants' Affirmative	67	2	67	4	FRE 402: Exhibit 3 lacks relevance and even if it were relevant it is of little probative value. FRE 403.	FRE 402/403: Exhibit 3 is highly relevant. These posts, and their timing, are relevant to the determination of Plaintiff's public reputation prior to the airing of the Series, which goes directly to both causation and damages. Exhibit 3 is highly probative of the public perception of Plaintiff at the time the posts it contains were written. Defendants would be severely prejudiced if they could not use Exhibit 3 to	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
							rebut Ms. Fairstein's claims of reputational and economic harm.	
Rossi, Laura	Defendants' Affirmative	67	8	67	18	See objection above. FRE 402: This testimony discusses a social media post from 2012 or 2013 and is not relevant to any issue in this case.	See response above.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	68	8	68	14	See objection above.	See response above.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	69	3	69	21	See objection above.	See response above.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	70	20	71	14	FRE 402: This testimony discusses a social media post from 2012 or 2013 and is not relevant to any issue in this case. Exhibit 3 also lacks relevance and even if it were relevant it is of little probative value. FRE 403.	FRE 402, 403: These posts, and their timing, are relevant to the determination of Plaintiff's public reputation prior to the airing of the Series, which goes directly to both causation and damages. Exhibit 3 is relevant for the same reasons, and is highly probative of the public	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
						71:3-8: Lacks Personal Knowledge (FRE 602). The witness stated that she does not recall or know about the Toobin article.	perception of Plaintiff at the time the posts it contains were written. FRE 602: This line of questioning is not about the Toobin article, but rather about tweets as to which Ms. Rossi has personal knowledge	
Rossi, Laura	Defendants' Affirmative	72	3	73	11	FRE 402: This testimony discusses social media posts from 2012 or 2013 and is not relevant to any issue in this case. Exhibit 3 also lacks relevance and even if it were relevant it is of little probative value. FRE 403.	See prior response regarding FRE 402 and 403.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	74	25	75	6	FRE 402: Whether the witness created any other memos during the 2012-2019 time period is not relevant to any issue in this case.	Whether Ms. Rossi created other memos documenting negative publicity for Ms. Fairstein is evidence of Ms. Fairstein's reputation prior to the airing of the Series, which is relevant to causation and damages.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Rossi, Laura	Defendants' Affirmative	76	5	76	6			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	76	10	77	15	<p>FRE 402: This testimony discusses an email about a social media post from 2013 and is not relevant to any issue in this case.</p> <p>FRE 802: Exhibit 4 is inadmissible hearsay comprised of out of court communications between Ms. Fairstein and Elizabeth Lederer. These communications also discuss threats to Ms. Lederer, which Defendants have moved to exclude from evidence in their Motion <i>In Limine</i> No. 6.</p> <p>The November 26, 2013 email from the witness to Ms. Fairstein constitutes hearsay. The email also contains a Facebook post that is hearsay if offered for the truth of the statements made therein.</p>	<p>FRE 402: This social media post is evidence of Ms. Fairstein's reputation prior to the airing of the Series, which is relevant to causation and damages.</p> <p>FRE 802: The designated testimony about Exhibit 4 does not seek to use Exhibit 4 for the truth of the matter asserted. In particular, the referenced Facebook post is not being offered for the truth of the matter asserted, but instead to demonstrate the fact that Plaintiff was the subject of negative social media posts of this type at this time. FRE 801(c)(2).</p>	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Rossi, Laura	Defendants' Affirmative	78	22	79	2	<p>FRE 602: The witness has no personal knowledge about this communication.</p> <p>FRE 802: out of court communications between Ms. Fairstein and Elizabeth Lederer are hearsay.</p> <p>FRE 402: an email written in 2013 about a Facebook post from that time is not relevant to any issue in this case.</p> <p>FRE 403: The probative value of this testimony and the part of Exhibit 4 that is being discussed is outweighed by the substantial prejudice that would be caused if it is admitted into evidence, including juror confusion, misleading the jury and wasting time.</p>	<p>FRE 602: The witness is copied on the original email in the chain. The exhibit is being used as an example of the type of post the witness would remove from Facebook for Ms. Fairstein.</p> <p>FRE 802: The statement by Ms. Fairstein is not hearsay because it is a statement by a party opponent (FRE 802). Moreover, the statements are not being offered for the truth of the matters asserted.</p> <p>FRE 402/403: The email is highly relevant because it goes to Ms. Fairstein's pre-Series reputation. It also goes to substantial truth of the type of conversations Ms. Fairstein and others had behind closed doors. There is nothing confusing about the document.</p>	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Rossi, Laura	Defendants' Affirmative	79	19 (Start at "Is this")	80	15	<p>79:19-22: See objections above.</p> <p>79:23-80:15:</p> <p>FRE 602: The witness has no personal knowledge about the communication between Ms. Fairstein and "Bobby" in Exhibit 5.</p> <p>FRE 802: out of court communications between Ms. Fairstein and Bobby are hearsay.</p> <p>Out of court communications between Ms. Fairstein and the witness are hearsay.</p> <p>The Twitter posts quoted in the email are hearsay if admitted for the truth of the statements made therein.</p> <p>FRE 402: an email written in 2013 about Twitter posts from that time is not relevant to any issue in this case. The probative value of the testimony and Exhibit 5 is minimal compared</p>	<p>79:19-22: See responses above.</p> <p>79:23-80:15:</p> <p>FRE 602: The witness has personal knowledge of the portion of the email chain that she is a party to, which is the subject of the line of questioning (not the communication with "Bobby").</p> <p>FRE 802: The email by Ms. Fairstein is not hearsay because it is a statement by a party opponent (FRE 802).</p> <p>The twitter posts are not being admitted for the truth of the matters asserted within them, but rather to evidence Ms. Fairstein's reputation and the criticisms she received before the Series aired (FRE 801).</p> <p>FRE 402: The twitter posts are relevant for the same reasons other social media posts are relevant, as stated above.</p>	<p><input type="checkbox"/> Sustained</p> <p><input type="checkbox"/> Overruled</p>

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
						to the substantial prejudice that could result if they are admitted, including juror confusion and wasting time. FRE 403.		
Rossi, Laura	Defendants' Affirmative	80	19	82	21	<p>FRE 602: The witness has no personal knowledge about the communication between Ms. Fairstein and "Bobby" in Exhibit 5.</p> <p>FRE 802: out of court communications between Ms. Fairstein and Bobby are hearsay.</p> <p>Out of court communications between Ms. Fairstein and the witness are hearsay.</p> <p>The Twitter posts quoted in the email are hearsay if admitted for the truth of the statements made therein.</p> <p>FRE 402: an email written in 2013 about Twitter posts from that time is not relevant to any</p>	See responses above.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
						issue in this case. The probative value of the testimony and Exhibit 5 is minimal compared to the substantial prejudice that could result if they are admitted, including juror confusion and wasting time. FRE 403.		
Rossi, Laura	Defendants' Affirmative	84	2	84	3	See objections above. FRE 611 -Argumentative	See responses above. FRE 611: The question asks the witness whether she agrees with a description of the tweets at issue and is not argumentative.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	84	5	84	6	See objections above	See responses above. Asking the witness to clarify the degree of negativity she perceives is not argumentative.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	84	8	84	11	See objections above	See responses above.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Rossi, Laura	Plaintiff's Counter	84	12	84	17	Plaintiff designates this testimony only to the extent the Court overrules her objections to 80:19-82:21, 84:2-3, 84:5-6, 84:8-11 and 84:18-21. FRE 611: The witness's answer is not responsive.		<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	84	18 (Start at "Did you see")	84	21	FRE 611 -Argumentative, Vague and Ambiguous FRE 402: Whether the witness saw negative commentary about a different film in 2013 is not relevant to any issue in this case and even if it were relevant the testimony is of minimal probative value compared to the risk of juror confusion and wasting time. FRE 403	Whether the witness saw negative commentary about the documentary is directly relevant to Plaintiff's reputation before the airing of the Series, which is relevant to causation and damages. Additionally, the question is not vague or ambiguous; it asks about specific commentary related to a specific documentary. Further, phrasing a question as yes-or-no (which the witness answered accordingly) is not argumentative.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Plaintiff's Counter	84	22	85	3	Plaintiff designates this testimony only to the extent the Court overrules her objections to 80:19-82:21,		<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
						84:2-3, 84:5-6, 84:8-11 and 84:18-21.		
Rossi, Laura	Defendants' Affirmative	85	22	85	24	FRE 402: Whether the witness removed or blocked negative posts from Ms. Fairstein's Facebook account in 2013 is not relevant to any issue in this case and even if it were relevant the testimony is of minimal probative value compared to the risk of juror confusion and wasting time. FRE 403	The witness's removal and blocking of posts is relevant and probative of Plaintiff's reputation prior to the airing of the Series, which go to causation and damages. They further demonstrate the witness's aversion to criticism, which goes to the substantial truth of her portrayal.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	86	3	86	10	86:3-4 FRE 402: Whether the witness removed or blocked negative posts from Ms. Fairstein's Facebook account in 2016 is not relevant to any issue in this case and even if it were relevant the testimony is of minimal probative value compared to the risk of juror confusion and wasting time. FRE 403.	See above response.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Rossi, Laura	Defendants' Affirmative	86	25	87	16	<p>FRE 602: The witness is reading hearsay into the record.</p> <p>FRE 611: This is not testimony.</p> <p>FRE 802: Exhibit 8 and related testimony are hearsay..</p>	<p>FRE 602/611: Exhibit 8 contains communications between Ms. Rossi and Ms. Fairstein, which the witness obviously was privy to and has personal knowledge of. FRE 611 does not apply, as the mode of questioning is proper.</p> <p>FRE 802: The out-of-court statements contained in Exhibit 8 are not being offered for their truth, so they are not hearsay. In fact, portions of Exhibit 8 contain questions, which are not statements at all.</p> <p>Moreover, Ms. Fairstein's statements are statements of a party opponent and the emails between the two constitute business records under FRE 803(6).</p>	
Rossi, Laura	Defendants' Affirmative	87	24	88	2			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Rossi, Laura	Defendants' Affirmative	91	10	92	3	<p>FRE 611 -Argumentative</p> <p>FRE 602 – Lack of Personal Knowledge- the witness testified at 91:5-6 that she was not acting as Ms. Fairstein's publicist.</p> <p>FRE 402, FRE 701 – Improper lay opinion testimony. Whether it is the witness's opinion that negative comments about Ms. Fairstein were bad publicity is not relevant to any issue in this case. Nor is it helpful to understanding the witness's testimony or determining a fact in issue.</p>	<p>FRE 611: Clarifying the witness's perception of the events is not argumentative.</p> <p>FRE 402/602/701: The witness does not need to be a publicist to provide a lay opinion on whether an event is good or bad publicity. Her opinion on the pre-Series publicity Ms. Fairstein received is relevant to Ms. Fairstein's reputational issues, as discussed above.</p>	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	92	19	92	21	<p>FRE 402 who the witness hired to work with her is not relevant to any issue in this case.</p>	<p>The identity of this third party is necessary to provide context to the exhibit referenced below. In any event, there is no potential prejudice from the admission of this factual information.</p>	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Rossi, Laura	Defendants' Affirmative	93	16	93	22	FRE 802 -Ex. 11 and related testimony are hearsay. The witness's out of court communications with her employee and Ms. Fairstein are hearsay.	This testimony is not hearsay. The witness testified this was the procedure she followed for negative comments on Facebook, Twitter and Instagram. In addition, the exhibit itself is not being offered or used for the truth of the matter asserted within it (i.e., that the witness prescheduled posts, that there was no new book release, that the Central Park Five case was in the news, etc.), but rather for the fact that the witness wrote these instructions, which demonstrates her concern with Ms. Fairstein's reputation before the Series aired. These pre-Series actions are relevant to Ms. Fairstein's reputation, causation and damages.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	94	2	95	8	FRE 802 -Ex. 11 and related testimony are hearsay. The witness's out of court communications with her employee and Ms. Fairstein are hearsay.	See previous response. The testimony at 94:24-95:8 is also factual testimony that is not hearsay.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Rossi, Laura	Defendants' Affirmative	95	15	96	13	FRE 802 -Ex. 11 and related testimony are hearsay. The witness's out of court communications with her employee and Ms. Fairstein are hearsay.	See response above. In addition, all of the designated testimony here asks about facts that do not constitute hearsay.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Plaintiff's Counter	98	10 [start at "we"]	98	14			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	99	21	100	6			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Plaintiff's Counter	100	7	100	8			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Plaintiff's Counter	100	10	100	12			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	102	18	102	23			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Rossi, Laura	Defendants' Affirmative	103	20	103	25			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	132	4	132	12	FRE 402 – the witness's involvement in this task is not relevant to any issue in this case.	The witness's involvement in this task is relevant because it provides helpful context and background as to Plaintiff's role in the website. The website is relevant for the reasons set forth in Defendants' Opposition to Plaintiff's Omnibus Motion <i>in Limine</i> , including substantial truth, Plaintiff's continued advocacy of the Five's guilt over time, Plaintiff's reputation, and damages. (See ECF No. 320 at 35-39.)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	134	12	135	16	FRE 402 – the witness's involvement in this task is not relevant to any issue in this case. FRE 802 - the witness's out of court communications with Ms. Fairstein are hearsay FRE 601 – this witness lacks personal knowledge about the	See above responses. FRE 802: This line of questioning is not asking about the truth of the witness's out of court statements, but rather about factual information as to which the witness testifies. FRE 601: The witness has personal knowledge of the email she sent, and of the	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
						subject matter of this line of questioning.	subject of the email itself (even if she claims to have not “set it up”).	
Rossi, Laura	Defendants’ Affirmative	135	24	136	12	FRE 402 – the witness’s and the other person’s involvement in this task is not relevant to any issue in this case.	See above responses.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants’ Affirmative	137	16	137	18	FRE 802 Exhibit 20, communications between the witness and Ms. Fairstein and discussing what a third party told the witness, is hearsay. FRE 402 – the communications in Exhibit 20 are not relevant to any issue in this case.	FRE 802: The emails from the witness are not being offered for the truth of the statements contained within them, but rather to demonstrate that the emails were sent/statements were made to Ms. Fairstein. For example, the witness's statement that "I e-mailed Kate earlier" is not being offered to prove that the witness emailed Kate, but rather to show that she told Ms. Fairstein this. Additionally, Ms. Fairstein's emails to the witness are statements by a party opponent. FRE 402: The communications are relevant because they provide helpful context and background as to Plaintiff’s role	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
							in the website. The witness's involvement in assisting Ms. Fairstein set up the website also goes to the credibility and bias of the witness. The website is relevant for the reasons set forth in Defendants' Opposition to Plaintiff's Omnibus Motion <i>in Limine</i> , including substantial truth, Plaintiff's continued advocacy of the Five's guilt over time, Plaintiff's reputation, and damages. (See ECF No. 320 at 35-39.)	
Rossi, Laura	Defendants' Affirmative	138	3	138	11	<p>FRE 802 – this testimony concerns hearsay/Exhibit 20.</p> <p>FRE 402 – the communications in Exhibit 20 are not relevant to any issue in this case</p>	See above responses.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	138	17	139	10	<p>FRE 602- the witness has no personal knowledge about Ms. Fairstein's beliefs or statements</p> <p>FRE 802 – this testimony concerns hearsay/Exhibit 20.</p>	<p>See above responses.</p> <p>FRE 602: Witness was asked about what Ms. Fairstein told her, not about what Ms. Fairstein subjectively believed.</p>	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
						FRE 402 – the communications in Exhibit 20 are not relevant to any issue in this case		
Rossi, Laura	Defendants' Affirmative	139	14	139	24	FRE 602 - the witness has no personal knowledge about Ms. Fairstein's beliefs or statements FRE 802 – this testimony concerns hearsay/Exhibit 20 FRE 402 – the communications in Exhibit 20 are not relevant to any issue in this case	See above responses.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	141	6	141	19	FRE 602 - the witness has no personal knowledge about Ms. Fairstein's beliefs or statements FRE 802 – this testimony concerns hearsay/Exhibit 20 FRE 402 – the communications in Exhibit 20 are not relevant to any issue in this case	See above responses.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Rossi, Laura	Defendants' Affirmative	142	2	142	4	FRE 402- Ms. Fairstein's provision of information to this witness is not relevant to any issue in this case.	Ms. Fairstein's provision of information is relevant because it provides helpful context and background as to Plaintiff's role in the website. The website is relevant for the reasons set forth in Defendants' Opposition to Plaintiff's Omnibus Motion <i>in Limine</i> , including substantial truth, Plaintiff's continued advocacy of the Five's guilt over time, Plaintiff's reputation, and damages. (See ECF No. 320 at 35-39.)	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	142	12	142	13	FRE 402- Ms. Fairstein's provision of information to this witness is not relevant to any issue in this case	See above response.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	143	13	143	18	FRE 402 – the site being discussed is not relevant to any issue in this case. 143:17-18: FRE 611 – Lacks foundation/assumes facts not in evidence	FRE 402: The website is relevant for all of the reasons stated in previous responses. FRE 611: The witness's answer demonstrates that she has personal knowledge as to who was responsible for fact checking the contents of the website.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Rossi, Laura	Defendants' Affirmative	143	20	143	20	FRE 402 – the site being discussed is not relevant to any issue in this case.	See above responses.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	144	22	145	16	<p>FRE 402- Exhibit 22 contains subject matter that is not relevant to any issue in this case.</p> <p>FRE 802 -the communications in Exhibit 22 are hearsay.</p> <p>FRE 602 – the witness has no personal knowledge about Ms. Fairstein's beliefs or motivations in making certain statements.</p>	<p>FRE 402: Ms. Fairstein's and the witness's monitoring of media and social media surrounding the Central Park Five and Ms. DuVernay, and her reaction to Ms. DuVernay, are relevant to substantial truth because they demonstrate Ms. Fairstein's inability to accept criticism, and are relevant to Ms. Fairstein's bias, credibility and her motivations in bringing this lawsuit.</p> <p>FRE 802: The statements by Ms. Fairstein in the emails are not hearsay because they are statements by a party opponent. The fact that the witness alerted Ms. Fairstein to interviews and articles in the media is not hearsay.</p>	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
							FRE 602: The witness is not being asked about any subjective belief or motivation of Ms. Fairstein; only about a statement she actually made.	
Rossi, Laura	Defendants' Affirmative	146	18	146	22	<p>FRE 802 -the communications in Exhibit 22 are hearsay.</p> <p>FRE 402 -this testimony is not relevant to any issue in this case.</p>	<p>FRE 802: Ms. Fairstein's email is a statement by a party opponent, and thus not hearsay and, in any event, it is being offered for the fact that Ms. Fairstein made these statements, and not for the truth of the matter asserted.</p> <p>FRE 402: Ms. Fairstein's direction is relevant to the substantial truth of her portrayal as a figure who relentlessly asserted the Five's guilt, and to her role in creating and promoting the website.</p>	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	150	7	150	9	FRE 802 – the communications in Exhibit 23 are hearsay.	The email is not being offered for the truth of the matter asserted within it, but rather to demonstrate that the witness sent the email to Kate.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Rossi, Laura	Defendants' Affirmative	150	17	150	21	<p>FRE 802 – the communications in Exhibit 23 are hearsay</p> <p>FRE 402- this testimony is not relevant to any issue in this case.</p>	<p>FRE 802: The witness is being asked to testify about an action she took, not about the veracity of an out-of-court statement.</p> <p>FRE 402: Plaintiff's attempt to grab the CentralPark5Facts handle is relevant to her further attempts to disseminate her views about the Five's guilt notwithstanding the vacatur of their convictions, her portrayal of her views as the "facts," her biases, and the substantial truth of the Series' portrayal of Plaintiff.</p>	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	154	20	154	22			<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	156	22	157	11	<p>FRE 611 – Argumentative, assumes facts not in evidence</p> <p>FRE 402- The portion of Exhibit 27 that is being asked about is not relevant and even if it were, it is more prejudicial than probative. FRE 403. The</p>	<p>FRE 611: The question asks about statements made in the underlying exhibit and is not argumentative.</p> <p>FRE 402/403: The exhibit is relevant to demonstrate the public perception of Ms.</p>	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
						witness's "understanding" of the subject matter of the post is not relevant to any issue in this case.	Fairstein, which is relevant to causation, damages, and substantial truth. Further, the witness's familiarity with the relationship between Ms. Fairstein and Harvey Weinstein is relevant because it goes to a non-Series factor that may have contributed to her reputational harm.	
Rossi, Laura	Defendants' Affirmative	157	13	157	19	FRE 402 - The portion of Exhibit 27 that is being asked about is not relevant and even if it were, it is more prejudicial than probative. FRE 403 . The witness's "understanding" of the subject matter of the post is not relevant to any issue in this case	See responses above.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	158	5	158	9	FRE 802 – Exhibit 53, a New York Times article, is inadmissible hearsay	The designated testimony related to this exhibit does not go to the truth of the matters asserted in the article. Rather, as set forth in 160:14-18 and 160:20, the designated testimony asks whether Ms. Fairstein informed the witness of this article.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Rossi, Laura	Defendants' Affirmative	160	14	160	18	FRE 611 – argumentative, assumes facts not in evidence	The question asks whether Plaintiff informed her of a specific fact, and is not phrased in an argumentative manner. Nor does the question assume facts not in evidence - it asks about the article the witness is shown and what Ms. Fairstein told the witness about that article.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	160	20	160	20	FRE 402 – This testimony is not relevant to any issue in this action.	Plaintiff's disclosure or nondisclosure to the witness of other factors that were negatively affecting Plaintiff's reputation besides the airing of the Series is relevant to Plaintiff's and the witness's credibility in their assertions that Ms. Fairstein's reputational damage resulted from the challenged scenes in the Series.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled
Rossi, Laura	Defendants' Affirmative	174	20	175	2	FRE 402 – This testimony is not relevant to any issue in this action.	This testimony is relevant to the witness's current relationship with the Plaintiff, which the jury will use to assess her credibility.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

Deposition of Laura Rossi, taken on June 30, 2022

Witness	Designation	Start Page	Start Line	End Page	End Line	Objections	Responses to Objections	Rulings
Rossi, Laura	Defendants' Affirmative	181	18	181	24	FRE 402 – This testimony is not relevant to any issue in this action.	See response above.	<input type="checkbox"/> Sustained <input type="checkbox"/> Overruled

EXHIBIT C

EXHIBIT C: PLAINTIFF'S TRIAL EXHIBIT LIST

Exhibit	Bates No.	Description	Defendants' Objections¹
PX-A	Video LF00050647	<i>When They See Us</i> date announce/teaser	** [Subject to clean version as discussed]
PX-B	Video LF00050652	<i>When They See Us</i> trailer	** [Subject to clean version as discussed]
PX-C	video and as shown on Netflix with auto play	<i>When They See Us</i> - Episode 1	*
PX-D	Video and as shown on Netflix with auto play	<i>When They See Us</i> – Episode 2	*
PX-E	Video and as shown on Netflix with auto play	<i>When They See Us</i> – Episode 4	*
PX-F	NYCLD_009876	Memo Book Entries re Statement by Steven Lopez; Show Up; Arrests; And the Investigation Of The Central Park Jogger Case, By PO Eric Reynolds (4 19 1989 and 4 20 1989)	*

¹ Defendants apply the identification system required by the Court: “one star indicating exhibits to which no party objects on grounds of authenticity, and two stars indicating exhibits to which no party objects on any ground.” Defendants do not read the Court’s order as requiring the parties to identify the basis for the objections at this stage. Defendants are willing and able to provide that information if the Court wishes. Unless the Court orders otherwise, in accordance with Federal Rule 26, Defendants will provide to Plaintiff the basis for their objections in advance of trial.

Exhibit	Bates No.	Description	Defendants' Objections ¹
PX-G	NYCLD_009926	Spiral Notepad Entries Re Arrests and Discovery of Patricia Meili, by PO Eric Reynolds (4-19-89 and 4-20-89)	*
P-H	NYCLD_009845	Memo Book Entries Re Investigation Of The Central Park Jogger Case, By PO Eric Reynolds (4 20 1989 and 4 21 1989)	*
PX-I	NYCLD_057937-938	E. Reynolds' notes	*
PX-J	NYCLD_057939-945	E. Reynolds' notes	*
PX-K	NYCLD_045080-45112	Reporter's Note Book	**
PX-L	NYCLD_045416	Ex. 22, R. Nugent Dep. 11/19/10 In re McCray	**
PX-M	EL000014	4.26.89 Law Journal Profile <i>Central Park Rape Prosecutor Seen Tough Enough for the Job</i>	*
PX-N	LF00030073-75	5.4.89 letter from E. Lederer to R. Morgenthau re Central Park Investigation	*
PX-O	LF00014732	Exhibit 27, E. Lederer Dep. 7/24/13 In re McCray	**
PX-P	LF00024894-95	3.29.90 letters from E. Lederer to Judge Galligan re sock DNA	**

Exhibit	Bates No.	Description	Defendants' Objections¹
PX-Q	LF00024902-944	4.2.90 Transcript of Pre-Trial Hearing	**
PX-R	NYCLD_000335	4.3.90 letter from E. Lederer to M. Joseph re serology report	*
PX-S	NYCLD_000353	4.3.90 letter from E. Lederer to P. Rivera re serology report	*
PX-T	NYCLD_000378	4.3.90 letter from E. Lederer to R. Burns re serology report	*
PX-U	NYCLD_000236	4.3.90 letter from E. Lederer to C. Moore re serology report	*
PX-V	NYCLD_000268	4.3.90 letter from E. Lederer to H. Diller re serology report	*
PX-W	NYCLD_000278	4.3.90 letter from E. Lederer to J. Berman re serology report	*
PX-X	LF00024896-901	4.5.90 Transcript of Pre-Trial Hearing	**
PX-Y	LF00024945	6.5.90 letter from E. Lederer to M. Joseph	**
PX-Z	LF00024946	6.5.90 letter from E. Lederer to R. Burns	**
PX-A1	LF00024947	6.5.90 letter from E. Lederer to P. Rivera re autoradiographs	**
PX-B1	LF00028550	5.25.90 FBI Report to E. Lederer re DNA Analysis	**
PX-C1	LF00050513	New York District Attorney News Release – December 11, 1990	*

Exhibit	Bates No.	Description	Defendants' Objections ¹
PX-D1	DEFS006947-7495 [DEFS007144-7495]	Central Park Five Research Binder- [Excerpted]	*
PX-E1	DEFS037478-37808	<i>Unequal Verdicts</i> , Sullivan, T.	**
PX-F1	DEFS037047-37303	<i>The Central Park Five</i> , Burns S.	**
PX-G1	DEFS175883-176109 DEFS175886, 175947-973	<i>And The Blood Cried Out</i> , Levy, H. [Excerpt]	*
PX-H1	DEFS092708-767	Nancy Ryan Affirmation in Support of Vacatur	**
PX-I1	DEFS145477, at 1:38:15-1:39:30	Video: K. Richardson Interview with S. Burns	*
PX-J1	DEFS083111-83146	K. Richardson Interview Notes 11.8.17	*
PX-K1	DEFS022188-22216	Antron McCray Interview Notes 11.7.17	*
PX-L1	DEFS023350-24093	<i>People v. Lopez</i> Hearing Minutes, Vol. I of VII – Excerpt: E. Reynolds [DEFS023671-24093]	*
PX-M1	DEFS024094-24804	<i>People v. Lopez</i> Hearing Minutes, Vol. III of VII - Excerpt: M. Sheehan	*

Exhibit	Bates No.	Description	Defendants' Objections ¹
		[DEFS024310-24508]	
PX-N1	DEFS025256-25982	<i>People v. Lopez</i> Hearing Minutes, Vol. V of VII –	*
PX-O1	DEFS013946-14782	<i>People v. McCray</i> , Trial Testimony, Volume 3, Excerpts: Gonzalez, H. Arroyo	*
PX-P1	NYCLD_023491-23716	<i>People v. McCray</i> Trial Testimony: E. Reynolds	*
PX-Q1	DEFS038605-39319	<i>People v. Wise</i> Trial Testimony Excerpts: C. Gonzalez, J. Hartigan, J. Freck [DEFS038695-38918, 38950-38974, 38984-39160]	*
PX-R1	DEFS020617-21411	<i>People v. Wise</i> Trial Testimony Excerpts: J. Hartigan, L. Fairstein [DEFS020649-20825, DEFS021079-21197]	*
PX-S1	DEFS014783-15675	<i>People v. McCray</i> Trial Testimony Excerpt: H. Hildebrandt [DEFS014845-15044]	*
PX-T1	DEFS015676-16569	<i>People v. McCray</i> Trial Testimony Excerpt: D. Nocenti [DEFS016367-446]	*

Exhibit	Bates No.	Description	Defendants' Objections ¹
PX-U1	DEFS016570-17307	<i>People v. McCray</i> Trial Testimony Excerpt: L. Fairstein [DEFS016980-17071]	*
PX-V1	DEFS004575-4584	K. Bouton, <i>Linda Fairstein v. Rape</i> , N.Y. Times, 2/15/90	**
PX-W1	DEFS176341-44	<i>A Prosecutor Speaks Up</i> , New Yorker, December 2, 2002, Toobin, J.	**
PX-X1	LF00001209	5.10.16 email from L. Fairstein to E. Newberg Re: Fm Jane Rosenthal	**
PX-Y1	LF00038346-38348	Email from L. Fairstein to J. Rosenthal dated 6.7.16	**
PX-Z1	DEFS061790-797	Skadden Arps 7.11.17 letter to Netflix	*
PX-A2	DEFS0022633-55	10.25.17 writers' room notes	**
PX-B2	DEFS083202-232	Email and attachments including 10.27.17 writer's room notes and list of secondary law enforcement characters	**
PX-C2	DEFS021412-426	1.8.18 Writers' Room notes	**
PX-D2	DEFS022401-407	1.24.18. Writer's Room Notes	**
PX-E2	DEFS035647-655	11.14.17 Legal Timeline	**
PX-F2	DEFS083147-83201	11.24.17 email attaching Story Outline for Episode 2	**

Exhibit	Bates No.	Description	Defendants' Objections ¹
PX-G2	DEFS035789-35916	1.3.18 draft script for Episode 2 “Guilty, Guilty, Guilty, Lies, Lies, Lies”	**
PX-H2	DEFS029031-34	Locke Script Notes – 1.24.18	**
PX-I2	DEFS029006-10	Notes/New Beat Sheet/PART TWO 3.20.18	**
PX-J2	DEFS030324-407	3.31.18 draft script for Episode 2	**
PX-K2	DEFS176211-213	11.27.18 email from Mystery Writers of America to A. Locke	**
PX-L2	LF00046408	A. Locke 11.27.18 tweet to Edgar Awards	**
PX-M2	LF00045937	A. Locke 11.27.18 Instagram Post	**
PX-N2	DEFS176185-86	11.27.18 emails between A. Locke and S. Cha	*
PX-O2	DEFS176147-152	11.29.18 texts between Locke and her agent	*
PX-P2	LF00046339	A. Locke 12.18.18 tweet	**
PX-Q2	LF00038401	A. Locke 5.29.19 Instagram post	**
PX-R2	LF00038405	A. Locke 5.31.19 tweet	**
PX-S2	DEFS177547-548	6.2.19 messages between Locke and DuVernay	**
PX-T2	DEFS176133-140	6.2.19 messages between A. Locke and A. DuVernay	*
PX-U2	LF00038472	A. Locke 6.4.19 Tweet	**

Exhibit	Bates No.	Description	Defendants' Objections ¹
PX-V2	LF00038473-76	A. Locke 6.4.19 Tweet	**
PX-W2	DEFS176145-146	6.7.19 texts between A. Locke and T.J.	*
PX-X2	LF00038411	6.11.19 A. Locke Tweet	**
PX-Y2	LF00037977	6.11.19 A. Locke Tweet	**
PX-Z2	LF00038418	7.11.19 A. Locke Tweet	**
PX-A3	DEFS163025	6.13.19 email from R. Swicord to J. Anderson	*
PX-B3	DEFS094138	12.11.17 email re Hartigen [<i>sic</i>] timeline 4.20.89	**
PX-C3	DEFS093375	11.18.17 Swicord email to DuVernay re Korey transcripts	**
PX-D3	DEFS092969-74	12.18.17 memo from Swicord to A. Locke and A. DuVernay “coerced confessions – how the misinformation flowed	**
PX-E3	DEFS0163022-23	6.11.19 email from R. Swicord to D. Kramer	*
PX-F3	DEFS091337-38	11.30.17 email from A. Locke to H. Baker re “CP5 Trial 1 Transcript Table of Contents”	**
PX-G3	DEFS093162-185	12.30.17 email from R. Swicord to A. Locke re “backstory”	**
PX-H3	DEFS009145	11.17.17 Email from R. Swicord to L. Hironoka with handwritten notes	*

Exhibit	Bates No.	Description	Defendants' Objections¹
PX-I3	DEFS159706	12.10.17 email from H. Baker to R. Swicord re “CP5 Writers Room Master Dropbox”	*
PX-J3	DEFS005074; DEFS005223	Excerpt: Central Park Five Writer’s Room, Robin Swicord	*
PX-K3	DEFS105016-19	Network Notes Call 2.6.18	**
PX-L3	DEFS022431-437	Writing Notes 2.10.18 DuVernay/Baker	**
PX-M3	DEFS0008152-246	Script Episode 1 (1.28.18)	**
PX-N3	DEFS004686-767	Script Episode 1 (5.29.18)	**
PX-O3	DEFS146801-887	Script Episode 1 (9.9.18)	**
PX-P3	DEFS129657-723	6.16.18 Script Draft 5 – Episode 2	**
PX-Q3	DEFS094234	4.24.18 B. Welsh email to DuVernay re “Draft of note to rep”	**
PX-R3	DEFS159923	4.25.18 email from Welsh to DuVernay re Fwd: Central Park Five/Netflix/AvaDuVernay/Tribeca	**
PX-S3	DEFS177653	5.13.18 text message from A. DuVernay to B. Welsh	*
PX-T3	DEFS169873-169887	7.18.18 Email from DuVernay to Netflix Publicity re Casting Announcement	**

Exhibit	Bates No.	Description	Defendants' Objections¹
PX-U3	DEFS177533-34	11.28.18 texts between A. Locke and A. DuVernay	**
PX-V3	DEFS159827-829	11.28.18 email from J. King to A. DuVernay re “LA Times-text pasted	*
PX-W3	DEFS159830	11.28.18 emails between J. Rosenthal, A. DuVernay, J. King and B. Welsh re “Central Park 5-Fairstein”	*
PX-X3	DEFS177591-594	11.30.18 text between Byrialsen and DuVernay	*
PX-Y3	DEFS159912-159914	1.18.19 email from J. King to B. Welsh, A. DuVernay and J. Rosenthal Re: CP5 102 notes	**
PX-Z3	DEFS172596-604	1.31.19 email from R. Stephens to A. DuVernay and others, with attachments	**
PX-A4	DEFS177578	2.19.19 text message from D. Martin to A. DuVernay	*
PX-B4	DEFS177317	5.12.19 text from A. DuVernay to F. Janssen	**
PX-C4	DEFS177542-43	5.18.19 texts between A. Locke and A. DuVernay	**
PX-D4	LF00055005	5.19.19 -A. DuVernay Tweet	*
PX-E4	LF00055007	5.24.19 – A. DuVernay Tweet	*
PX-F4	LF00055028	5.31.19 A. DuVernay Tweet	*
PX-G4	LF00055066	6.1.19 A. DuVernay Tweet	*

Exhibit	Bates No.	Description	Defendants' Objections ¹
PX-H4	LF00038454-56	6.5.19 "Message From Ava DuVernay About #WhenTheySeeUs-Central Park Five"	**
PX-I4	DEFS177725	6.5.19 A. DuVernay text to T.N.	*
PX-J4	DEFS177503-507	6.8.19 messages between R. Swicord, A. Locke and A. DuVernay containing the link: https://www.nbcnews.com/news/nbcblk/central-park-5-prosecutor-linda-fairstein-dropped-publisher-after-public-n1015391	**
PX-K4	LF00038395	6.10.19 A. DuVernay Tweet	**
PX-L4	LF00055112	6.12.19 A. DuVernay Tweet	**
PX-M4	DEFS177522	6.12.19 texts between H. Baker and A. DuVernay	**
PX-N4	DEFS177492-177502	6.20.19 texts with A. DuVernay and S.A.	*
PX-O4	LF00038547-38563	T. Gross, <i>Ava DuVernay Focuses on the Central Park 5's Perspective, Now People Know</i> , June 19, 2019	**
PX-P4	DEFS170314-15	8.2.18 emails re "CP5/Potential Flag"	*

Exhibit	Bates No.	Description	Defendants' Objections ¹
PX-Q4	DEFS169151-152	Emails between A. Engel and J. Rosenthal 8.4.18	**
PX-R4	DEFS144759-767	Netflix <i>When They See Us</i> fka <i>Central Park Five</i> PR Strategy	*
PX-S4	DEFS169113-117	When They See Us Communications Plan	*
PX-T4	DEFS145244	“CP5 Culture Summit” – AE Notes	*
PX-U4	DEFS146894-895	11.27.18 email from J. Rosenthal to A. DuVernay, B. Welsh, A. Engel and N. Wolarsky re: Central Park Five-Fairstein, with attachment	**
PX-V4	DEFS148240-42	12.27.18 emails between Netflix and A. DuVernay re Netflix “cut notes,” Episode 1	**
PX-W4	DEFS169183-186	1.15.19 email thread re 101 v.2 cut notes	**
PX-X4	DEFS169178-179	1.27.19 emails between Cindy Holland and A. Engel re “cp5 cuts”	**
PX-Y4	DEFS174827-828	1.28.19 email from A. Engel to A. DuVernay and producers re cp5 101 and 102 cut notes	**
PX-Z4	DEFS145571	2.3.19 messages between A. Engel and N. Wolarsky re Ep. 101 Cut	**

Exhibit	Bates No.	Description	Defendants' Objections ¹
PX-A5	DEFS145536	2.11.19 email from A. Engel to N. Wolarsky re “cp5 date announce”	*
PX-B5	DEFS153979-984	2.14.19 messages between D. Martin and L. Galbraith	*
PX-C5	DEFS153631-633	2.18.19 emails between Ashleigh Lew and Denise Martin Re: DRAFT NOTE RE: When They See Us Date Announce	*
PX-D5	DEFS169766-767	2.19.19 email from D. Martin to A. DuVernay, J. Rosenthal, B. Welsh and J. King re “When They See Us-date/title announce”	*
PX-E5	DEFS169055-169071	When They See Us Task Force Agenda	*
PX-F5	DEFS078571-573	2.24.19 email forward from N. Wolarsky to A. Engel	*
PX-G5	DEFS145040-42	Netflix Notes 2.25.19	**
PX-H5	LF00051446	“When They See Us” Twitter account	*
PX-I5	https://twitter.com/WhenTheySeeUs/status/1101499740506611713 LF00047677	3.1.19 When They See Us Tweet with film teaser embedded	*
PX-J5	DEFS075501-502	3.20.19 email from Netflix to DuVernay	*

Exhibit	Bates No.	Description	Defendants' Objections ¹
PX-K5	DEFS153803	3.20.19 email from DuVernay to Netflix	*
PX-L5	DEFS159953-56	3.26.19 appointment reminder re WTSU trailer	*
PX-M5	LF00038424	4.19.19 When They See Us Tweet	*
PX-N5	LF00038425	5.1.19 When They See Us Tweet	*
PX-O5	LF00038426	5.2.19 When They See Us Tweet	*
PX-P5	LF00038427	5.8.19 When They See Us Tweet	*
PX-Q5	LF00038430	5.31.19 When They See Us Tweet	*
PX-R5	DEFS158620-624	5.24.19 email from J. Wolff to N. Bannister	*
PX-S5	DEFS082666-68	6.3.19 email from C. Colmenero re J. Wolff re “TIMELY Ava request—Linda clip”	*
PX-T5	DEFS149015-016	6.3.19 email from C. Colmenero to E. Abramson and copying J. Wolff	*
PX-U5	DEFS177304-177306	<i>When They See Us Social Insights Launch Report [color copy]</i>	*
PX-V5	DEFS145532-145535	Email from M. Stephens to J. King re When They See Us Launch Report + Next Steps	*
PX-W5	DEFS153640-642	6.5.19 email from T. Boyd to M. Stephens re: When They See Us: Fairstein Demonstration Tomorrow	*

Exhibit	Bates No.	Description	Defendants' Objections ¹
PX-X5	DEFS082192-195	6.13.19 email from J. Wolff to C. Colmenero Re: When They See Us Tweet https://twitter.com/netflix/status/1138900711708667904	*
PX-Y5	DEFS145098-145128	7.2.19 CP&A Performance Update	*
PX-Z5	DEFS151058-151061	12.12.19 email from C. Colmenero to C. Aquino with attachment	*
PX-A6	LF00030060-61	L. Fairstein, “‘The Real SVU’: We kicked open the courtroom doors and got justice for sex-crime victims” May 21, 2018	**
PX-B6	LF00035817-820	G. Bon, <i>Believe the Women: Mysteries & Thrillers 2018-2019</i> , Publisher’s Weekly, Nov. 16, 2018	*
PX-C6	LF00035851	11.28.18 email from L. Fairstein to E. Canders re “Checking In”	*
PX-D6	LF00035883-84	12.3.18 email forwarding N. DeMille email to MWA	*
PX-E6	LF00036024	3.18.19 email from L. Fairstein to E. Newberg re “having our numbers person do the math”	*
PX-F6	LF00041888	3.20.19 email from E. Newberg to L. Fairstein re “John P”	*

Exhibit	Bates No.	Description	Defendants' Objections¹
PX-G6	LF00040128-129	3.20.19 email from L. Fairstein to E. Newberg re “Linda Fairstein”	*
PX-H6	LF00040403	3.23.19 email from E. Canders to L. Fairstein “Blood Oath in NY Post”	*
PX-I6	LF00040400-401	3.26.19 email from E. Vaysbeyn to L. Rossi re “Kate White Tweet”	**
PX-J6	LF00040402	4.26.19 email from E. Vaysbeyn to E. Canders Re “Nice Shout Out From Kate White”	**
PX-K6	LF00040429-430	3.26.19 email from E. Vaysbeyn to L. Fairstein re “Good Day NY Clips + more pub day news”	**
PX-L6	LF00040419-420	4.5.19 email from E. Canders to L. Fairstein re “Blood Oath Updates”	*
PX-M6	LF00040425-426	4.14.19 email from E. Canders to L. Fairstein re “RJ Julia + 2020 Invitation”	*
PX-N6	LF00040428	5.9.19 email from E. Canders to L. Fairstein re “CBS This Morning Podcast is Live”	*
PX-O6	LF00040427	6.11.19 email from L. Fairstein to L. Rossi re “Media request-Linda Fairstein Good Morning America”	*
PX-P6	LF00040408-410	4.24.19 email from E. Vaysbeyn to L. Rossi	*
PX-Q6	LF00040447-51	4.23.19 email from E. Canders to L. Rossi re “FW: Washington Post-Maureen Corrigan piece”	*

Exhibit	Bates No.	Description	Defendants' Objections ¹
PX-R6		Cha, S. "Writer Linda Fairstein's Past as a prosecutor overseeing the Central Park Five case causes award controversy," <i>L.A. Times</i> , Nov. 27, 2018	*
PX-S6	LF00038361-363	S. Piccoli & M. Gold, "After Furor, Literary Group Withdraws Honor for 'Central Park Five' Prosecutor," <i>N.Y. Times</i> , Nov. 28, 2018	*
PX-T6	LF00038675-38690	#CancelLindaFairstein	*
PX-U6	LF00038487-38493 https://actionnetwork.org/petitions/reopen-linda-fairsteins-cases-now	Reopen Linda Fairstein's Cases NOW, Color of Change Petition	*
PX-W6	LF00038500-38502 https://act.colorofchange.org/survey/reopen_linda_fairstein_cases_petition_delivery/	Tell DA Cy Vance to Reopen Linda Fairstein's Cases NOW, Color of Change Petition	*
PX-X6	LF00038494-38499	A. Joyner, <i>Central Park Five: Decision Not to Re-Open Linda Fairstein Case Blasted as a Disgrace</i> , Newsweek, June 18, 2019	**

Exhibit	Bates No.	Description	Defendants' Objections ¹
PX-Y6	LF00038503-38520 https://www.change.org/p/vassar-college-remove-linda-fairstein-from-vassar-college-board-of-trustees	Change.Org, Petition Remove Linda Fairstein from Vassar College Board of Trustees	**
PX-Z6	LF00038528-38532	J. Fink, <i>Central Park Five Prosecutor Linda Fairstein Resigns from Vassar College Board of Trustees After Petition</i> , Newsweek, June 4, 2019	*
PX-A7	LF00038450-453	E. Harris, <i>Linda Fairstein, Once Cheered, Faces Storm After When They See Us</i> , NY Times, 6.6.19	*
PX-B7	LF00038457-38471	K. Storey, <i>When They See Us Sparked A Boycott Against Central Park Five Prosecutor Linda Fairstein</i> , Esquire, June 7, 2019	*
PX-C7	LF00038481-38483	H. Italie, AP News, <i>Publisher Drops Central Park Five Prosecutor Linda Fairstein</i> , June 7, 2019	*
PX-D7	LF00038446-449	J. Smith, <i>Who's The Villain in When They See Us</i> , Rolling Stone, June 8, 2019	*
PX-E7	LF00038484-38486	P. Rogo, <i>Linda Fairstein Dropped By Hollywood Literary Agency Amid When They See Us Backlash</i> , Essence, June 12, 2019	*
PX-F7	LF00038533-535	S. Barry, Glamour, Letter From the Editor, <i>A Note on Linda Fairstein's Woman of the Year Award</i>	*

Exhibit	Bates No.	Description	Defendants' Objections ¹
PX-G7	LF00038538-38543	A Stockler, <i>Amy Klobuchar Returns Donation from Central Park Five Prosecutor Linda Fairstein</i> , Jan. 4, 2020	*
PX-H7	LF00038059-38080	"From Twitter (as of May 31, 2019 at 10:53 a.m.)"	*
PX-I7	LF00038120-38141	"Twitter document #2 New Set May 31 1pm"	*
PX-J7	LF00038081-38119	"Twitter Memo #3 Linda Fairstein Account"	*
PX-K7	LF00038155-38158	Daily Kos petition "The Exonerated Five were just the start DEMAND every Linda Fairstein case be reopened."	*
PX-L7	LF00038055-56	Petition, Amazon Ban the Sale of All Books Linda Fairstein Books for the Central Park Five #WhenTheySeeUs	*
PX-M7	LF00047698-4770	Linda Fairstein Wikipedia	*
PX-N7	LF00049707	11.29.18 email from L. Fairstein to L. Rossi re "Facebook"	**
PX-O7	LF00036431	6.2.19 email from L. Fairstein to L. Rossi re "We might need to take down my Instagram account, too"	*

Exhibit	Bates No.	Description	Defendants' Objections¹
PX-P7	LF00005575-5593	Penguin/Dutton Alex Cooper #22 and #23, June 4, 2019 Agreement	**
PX-Q7	LF00005568-69	June 7, 2019 letter agreement between Penguin/Dutton and L. Fairstein, Untitled Alex Cooper #22, #23 and Graveyard	**
PX-R7	LF00005573-5574	June 26, 2019 letter agreement regarding reversion of rights to L. Fairstein	**
PX-S7	LF00041894-895	September 23, 2019 agreement between L. Fairstein and Gere Donovan Press	**
PX-T7	LF00029992	Gere Tactical Royalty Report January 2019-September 2021	**
PX-U7		Figure 1 - Expert Report of Doug Bania, dated June 17, 2022	*
PX-V7		Figure 2 - Expert Report of Doug Bania, dated June 17, 2022	*
PX-W7		Figure 3 - Expert Report of Doug Bania, dated June 17, 2022	*
PX-X7		Figure 6- Expert Report of Doug Bania, dated June 17, 2022	*

Exhibit	Bates No.	Description	Defendants' Objections¹
PX-Y7		Figure 7 - Expert Report of Doug Bania, dated June 17, 2022	*
PX-Z7		Figure 10 - Expert Report of Doug Bania, dated June 17, 2022	*
PX-A8		Schedule 1a -Expert Report of Doug Bania, dated June 17, 2022	*
PX-B8		Schedule 2 -Expert Report of Doug Bania, dated June 17, 2022	*
PX-C8		Schedule 3 -Expert Report of Doug Bania, dated June 17, 2022	*
PX-D8		Schedule 4a -Expert Report of Doug Bania, dated June 17, 2022	*
PX-E8		Schedule 4b -Expert Report of Doug Bania, dated June 17, 2022	*
PX-F8		Schedule 5a -Expert Report of Doug Bania, dated June 17, 2022	*
PX-G8		Schedule 5b -Expert Report of Doug Bania, dated June 17, 2022	*

Exhibit	Bates No.	Description	Defendants' Objections ¹
PX-H8		Schedule 6a -Expert Report of Doug Bania, dated June 17, 2022	*
PX-I8		Schedule 6b -Expert Report of Doug Bania, dated June 17, 2022	*
PX-J8		Schedule 7a -Expert Report of Doug Bania, dated June 17, 2022	*
PX-K8		Schedule 7b -Expert Report of Doug Bania, dated June 17, 2022	*
PX-L8		Schedule 8 - Expert Report of Doug Bania, dated June 17, 2022	*
PX-M8		Schedule 9 -Expert Report of Doug Bania, dated June 17, 2022	*
PX-N8		Schedule 10 – Expert Report of Doug Bania, dated June 17, 2022	*
PX-O8	DEFS175880	Monthly watchers for When They See Us from launch through Feb 2022	**
PX-P8	LF00031951-32028	Fairstein Enterprises Tax Return - 2013	**
PX-Q8	LF00031887-31950	Fairstein Enterprises Tax Return - 2014	**

Exhibit	Bates No.	Description	Defendants' Objections¹
PX-R8	LF00028642-28707	Fairstein Enterprises Tax Return - 2015	**
PX-S8	LF00028805-28876	Fairstein Enterprises Tax Return - 2016	**
PX-T8	LF00028973-29051	Fairstein Enterprises Tax Return - 2017	**
PX-U8	LF00029153-29224	Fairstein Enterprises Tax Return - 2018	**
PX-V8	LF00029320-29392	Fairstein Enterprises Tax Return - 2019	**
PX-W8	LF00029461-29513	Fairstein Enterprises Tax Return - 2020	**
PX-X8	LF00029514-29529	August 13, 2012 Publishing Agreement - Dutton	**
PX-Y8	LF00029569-29584	August 26, 2015 Publishing Agreement -Dutton/Penguin	**
PX-Z8	LF00029853-29870	October 30, 2017 Publishing Agreement -Dutton/Penguin	**
PX-A9	EL000004	Letter from T. Galligan to Daily News June 3, 1996	*
PX-B9	LEDERER01208	8.16.18 email from E. Lederer to CAA re "Prosecutor in the CPJ Prosecution"	**
PX-C9	EL000055	6.13.91 Letter to E. Lederer from Polone Company	*
PX-D9	PRH000109-112	6.3.19 email from E. Canders to C. Ball	*
PX-E9	PRH000113-114	6.3.19 email from A. Walker to C. Ball	*

Exhibit	Bates No.	Description	Defendants' Objections ¹
PX-F9	PRH000121-122	6.3.19 email from A. Walker to L. Monaco	*
PX-G9	PRH000128-129	6.4.19 email from E. Canders to C. Ball	*
PX-H9	PRH000130-132	6.4.19 email from C. Ball to E. Canders	*
PX-I9	PRH000133-134	6.4.19 email from C. Ball to L. Fairstein	*
PX-J9	PRH000169-172	6.6.19 email from C. Ball to S. Dye	*
PX-K9	PRH000180	6.6.19 email from C. Von Schilling to A. Dobson and C. Ball	*
PX-L9	PRH000201	6.7.19 email from J. Parsley to C. Ball	**
PX-M9	DEFS075134-138	6.7.19 email from M. Stephens to W. Buggs re “When They See Us Social Launch Report & Next Steps”	*
PX-N9	DEFS146916-922	6.11.19 email from T. Boyd to M. Stephens re “When They See Us Social Launch Report & Next Steps”	*
PX-O9	DEFS150789-799	4.17.19 email from C. Colmenero to J. Wolff re “When They See Us X-Functional Campaign...,” with attachment	*
PX-P9	DEFS150285	7.25.18 email from D. Walker to C. Colmenero	*

Exhibit	Bates No.	Description	Defendants' Objections ¹
PX-Q9	DEFS154959-977	2.9.19 email from D. Martin to A. DuVernay re “When They See Us-date announce asset”	*
PX-R9	DEFS171522-555	2.14.19 email from L. Galbraith to D. Martin re “CP5:Room to Room for Review”	*
PX-S9	DEFS153721-723	2.28.19 email from E. Painter to D. Martin re “When They See Us-date/title announce plan”	*
PX-T9	DEFS154941-948	3.8.19 email from M. Stephens to K. Marston re “WTSU-Date Announce Sentiment Report”	*
PX-U9	DEFS172716-720	3.18.19 email from S. Simmons to M. Stephens re “Strong Black Lead Task Force Bi-Weekly”	*
PX-V9	DEFS145397-405	When They See Us Trailer Sentiment Report	*
PX-W9	DEFS178197	Video of CBS News, Lesley Stahl interview 2017-07-16	*

Exhibit	Bates No.	Description	Defendants' Objections ¹
PX-X9	LF00041890-91	8.2.19 email from R. Lippel to L. Fairstein	*
PX-Y9		Exhibit 3 – Doug Bania Dep. – Google search results (6/1/19-6/30/19)	*
PX-Z9	DEFS144587-607	A. DuVernay July 6, 2017 Loanout Agreement	*
PX-A10	DEFS144557-576	A. Locke September 7, 2017 Loanout Agreement	*
PX-B10	DEFS144464-483	R. Swicord September 29, 2017 Loanout Agreement	*
PX-C10		Defendant Attica Locke's Supplemental Responses and Objections to Plaintiff's Second Set of Interrogatories, dated June 21, 2022	*
PX-D10		Defendant Ava DuVernay's Supplemental Responses and Objections to Plaintiff's Second Set of Interrogatories, dated June 6, 2022	*

Exhibit	Bates No.	Description	Defendants' Objections ¹
PX-E10		Defendant Netflix, Inc.'s Supplemental Responses and Objections to Plaintiff's Second Set of Interrogatories, dated June 22, 2022	*
PX-F10		Netflix Annual Report 2019 Form 10-K	*
PX-G10		July 17, 2019 Netflix Letter to Shareholders	*
PX-H10		Netflix Annual Report 2020 Form 10-K	*
PX-I10		Netflix Annual Report 2021 Form 10-K	*
PX-J10		Netflix Annual Report 2022 Form 10-K	*
PX-K10		Netflix Annual Report 2023 Form 10-K	*

Exhibit	Bates No.	Description	Defendants' Objections ¹
PX-L10		Netflix Quarterly Earnings 1 st Quarter 2024	*
PX-M10		Forbes Profile: Ava DuVernay https://www.forbes.com/profile/ava-duvernay/?sh=572c72dd2547	*
PX-N10		Park, A., "Ava DuVernay Asks \$2.5 Million For Hollywood Hills Home," Architectural Digest, January 6, 2021	*
PX-O10		What We Watched: A Netflix Engagement Report Hours Viewed From January to June 2023	*
PX-P10		2020 Pepperdine Private Capital Markets Report	*
PX-Q10	PRH000115	6.3.19 email re Linda Fairstein	*
PX-R10	PRH000178	6.6.19 email to E. Newberg	*

Exhibit	Bates No.	Description	Defendants' Objections ¹
PX-S10		Netflix, Inc. CapIQ Tearsheet	*
PX-T10	PRH000482-483	11.29.18 emails “RE: Fairstein-MWA Grand Master is being revoked	*
PX-U10	PRH000495	11.27.18 Tweet – A. Locke	**
PX-V10		E. Harris and J. Jacobs, “Linda Fairstein Dropped by Her Publisher After TV Series on the Central Park 5,” N.Y. Times, June 7, 2019	*
PX-W10	LF00036570	6.7.19 email from L. Fairstein re “breaking news”	*
PX-X10	PRH000214	6.10.19 email re “Linda Fairstein”	*
PX-Y10		The Comprehensive Guide to Economic Damages: Volume One Ch. 10: Context of the Lost Profits Damages Claim	*

Exhibit	Bates No.	Description	Defendants' Objections ¹
PX-Z10		The Comprehensive Guide to Economic Damages: Volume One Ch. 11: Planning Credible Lost Profits Analyses for Financial Experts	*

EXHIBIT D

EXHIBIT D: DEFENDANTS' TRIAL EXHIBIT LIST¹

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX001A	Episode 1 of <i>When They See Us</i>	2019-05-31	Ex. 30 to Defendants' Motion for Summary Judgment		*
DX001B	Episode 2 of <i>When They See Us</i>	2019-05-31	Ex. 30 to Defendants' Motion for Summary Judgment		*
DX001C	Episode 3 of <i>When They See Us</i>	2019-05-31	Ex. 30 to Defendants' Motion for Summary Judgment		* FRE 402, FRE 403
DX001D	Episode 4 of <i>When They See Us</i>	2019-05-31	Ex. 30 to Defendants' Motion for Summary Judgment		*
DX002	Landing Page for <i>When They See Us</i> www.netflix.com		Ex. 48 to Defendants' Motion for Summary Judgment		*

¹ Plaintiff objects to Defendants' designation of an excessive number of trial exhibits (792) most of which lack any relevance to the issues to be tried in this case.

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX003	<i>Savage Portrayals: Race, Media, & the Central Park Jogger Story</i> , by Natalie Byfield		DEFS036779	DEFS037018	* FRE 802
DX004	<i>The Central Park Five</i> , by Sarah Burns		DEFS176349	DEFS176607	* FRE 802
DX005	<i>Unequal Verdicts: The Central Park Jogger Trials</i> , by Timothy Sullivan	1995-06-14	DEFS176705	DEFS177033	* FRE 802
DX006	<i>The Central Park Five</i> Documentary by Ken Burns	undated	DEFS174857		* FRE 802, FRE 403
DX007	<i>And the Blood Cried Out: A Prosecutor's Spellbinding Account of DNA's Power to Free or Convict</i> , by Harlan Levy		DEFS175883	DEFS176109	* FRE 402, FRE 802
DX008	Nancy Ryan Affirmation in Response to Motion to Vacate Judgment of Conviction	2002-12-05	DEFS010123	DEFS010180	* FRE 802
DX009	Email from B. Welsh attaching Nancy Ryan Affirmation in Response to Motion to Vacate Judgment of Conviction	2017-12-07	DEFS092707	DEFS092767	* FRE 802
DX010	Audio of Kevin Richardson Writers' Room Interview Part 1 M1.mp3	2017-11-08	DEFS010936	DEFS010936	* FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX010B	Excerpt of transcript of Kevin Richardson Writers' Room Interview Part 1 M1 prepared by stenographer at the direction of Defendants' counsel		Forthcoming		FRE 106
DX011	Audio of Kevin Richardson Writers' Room Interview Part 2 M1.mp3	2017-11-08	DEFS010937	DEFS010937	* FRE 802
DX011B	Excerpt of transcript of Kevin Richardson Writers' Room Interview Part 2 M1 prepared by stenographer at the direction of Defendants' counsel		Forthcoming		FRE 106
DX012	Audio of Kevin Richardson Writers' Room Interview Part 3 M1.mp3	2017-11-08	DEFS010938	DEFS010938	* FRE 802
DX012B	Excerpt of transcript of Kevin Richardson Writers' Room Interview Part 3 M1 prepared by stenographer at the direction of Defendants' counsel		Forthcoming		FRE 106
DX013	Audio of Raymond Santana Writers' Room Interview Part 1 M1.mp3	2017-11-06	DEFS010939	DEFS010939	* FRE 802
DX013B	Excerpt of transcript of Raymond Santana Writers' Room Interview Part 1 M1 prepared by stenographer at the direction of Defendants' counsel		Forthcoming		FRE 106
DX014	Audio of Raymond Santana Writers' Room Interview Part 2 M1.mp3	2017-11-06	DEFS010940	DEFS010940	*

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
					FRE 802
DX014B	Excerpt of transcript of Raymond Santana Writers' Room Interview Part 2 M1 prepared by stenographer at the direction of Defendants' counsel		Forthcoming		FRE 106
DX015	Audio of Yusef Salaam Writers' Room Interview M1.mp3	2017-11-09	DEFS010941	DEFS010941	* FRE 802
DX015B	Excerpt of transcript of Yusef Salaam Writers' Room Interview M1 prepared by stenographer at the direction of Defendants' counsel		Forthcoming		FRE 106
DX016	Audio of Antron McCray Writers' Room Interview Part 1 M1.mp3	2017-11-07	DEFS010942	DEFS010942	* FRE 802
DX016B	Excerpt of transcript of Antron McCray Writers' Room Interview Part 1 M1 prepared by stenographer at the direction of Defendants' counsel		Forthcoming		FRE 106
DX017	Audio of Antron McCray Writers' Room Interview Part 2 M1.mp3	2017-11-08	DEFS010943	DEFS010943	* FRE 802
DX017B	Excerpt of transcript of Antron McCray Writers' Room Interview Part 2 M1		Forthcoming		FRE 106

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
	prepared by stenographer at the direction of Defendants' counsel				
DX018	Audio of Korey Wise Writers' Room Interview Part 1.mp3	2017-11-13	DEFS009973	DEFS009973	* FRE 802
DX018B	Excerpt of transcript of Korey Wise Writers' Room Interview Part 1 prepared by stenographer at the direction of Defendants' counsel		Forthcoming		FRE 106
DX019	Audio of Korey Wise Writers' Room Interview Part 2.mp3	2017-11-13	DEFS009974	DEFS009974	* FRE 802
DX019B	Excerpt of transcript of Korey Wise Writers' Room Interview Part 2 prepared by stenographer at the direction of Defendants' counsel		Forthcoming		FRE 106
DX020	Transcript from the trial of Antron McCray, Raymond Santana and Yusef Salaam V1--1-500.pdf	1990-06-25	DEFS012048	DEFS012547	* FRE 802
DX021	Transcript from the trial of Antron McCray, Raymond Santana and Yusef Salaam V1--501-1013.pdf	1990-06-27	DEFS012548	DEFS013060	* FRE 802
DX022	Transcript from the trial of Antron McCray, Raymond Santana and Yusef Salaam V2--1013-1886.pdf	1990-07-03	DEFS013061	DEFS013945	* FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX023	Transcript from the trial of Antron McCray, Raymond Santana and Yusef Salaam V3--1887-2720.pdf	1990-07-11	DEFS013946	DEFS014782	* FRE 802
DX024	Transcript from the trial of Antron McCray, Raymond Santana and Yusef Salaam V4--2721-3613.pdf		DEFS014783	DEFS015675	* FRE 802
DX025	Transcript from the trial of Antron McCray, Raymond Santana and Yusef Salaam V5--3614-4501.pdf		DEFS015676	DEFS016569	* FRE 802
DX026	Transcript from the trial of Antron McCray, Raymond Santana and Yusef Salaam V6--4501-5241.pdf		DEFS016570	DEFS017307	* FRE 802
DX027	Transcript from the trial of Antron McCray, Raymond Santana and Yusef Salaam V7--5242 + Sentencing.pdf		DEFS017308	DEFS018044	* FRE 802
DX028	Transcript from the trial of Kevin Richardson and Korey Wise V1-1-577.pdf		DEFS018045	DEFS018622	* FRE 802
DX029	Transcript from the trial of Kevin Richardson and Korey Wise V2-578-1223.pdf		DEFS018623	DEFS019270	* FRE 802
DX030	Transcript from the trial of Kevin Richardson and Korey Wise V3-1224-1846.pdf		DEFS019271	DEFS019895	* FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX031	Transcript from the trial of Kevin Richardson and Korey Wise V4-1847-2558.pdf		DEFS019902	DEFS020616	* FRE 802
DX032	Transcript from the trial of Kevin Richardson and Korey Wise V5-2559-3348.pdf		DEFS020617	DEFS021411	* FRE 802
DX033	Transcript from the trial of Kevin Richardson and Korey Wise V6-3349-4061.pdf		DEFS021427	DEFS022141	* FRE 802
DX034	Email from Hannah Baker containing link to trial transcripts	2017-11-02	DEFS082930		* FRE 802
DX035	Email from Hannah Baker containing link to suppression hearing transcripts	2017-11-06	DEFS082881		* FRE 802
DX036	Audio of Antron McCray Interview with Julian Breece part1.mp3		DEFS022374	DEFS022374	* FRE 802
DX036B	Excerpt of transcript of Antron McCray Interview with Julian Breece part1 prepared by stenographer at the direction of Defendants' counsel		Forthcoming		FRE 106
DX037	Audio of Antron McCray Interview with Julian Breece part2.mp3		DEFS022375	DEFS022375	* FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX037B	Excerpt of transcript of Antron McCray Interview with Julian Breece part2 prepared by stenographer at the direction of Defendants' counsel		Forthcoming		FRE 106
DX038	Audio of Kevin Richardson Interview with Julian Breece.mp3		DEFS022376	DEFS022376	* FRE 802
DX038B	Excerpt of transcript of Kevin Richardson Interview with Julian Breece prepared by stenographer at the direction of Defendants' counsel		Forthcoming		FRE 106
DX039	Audio of Raymond Santana Interview with Julian Breece part1.mp3		DEFS022377	DEFS022377	* FRE 802
DX039B	Excerpt of transcript of Raymond Santana Interview with Julian Breece part1 prepared by stenographer at the direction of Defendants' counsel		Forthcoming		FRE 106
DX040	Audio of Raymond Santana Interview with Julian Breece part2.mp3		DEFS022378	DEFS022378	* FRE 802
DX040B	Excerpt of transcript of Raymond Santana Interview with Julian Breece part2 prepared by stenographer at the direction of Defendants' counsel		Forthcoming		FRE 106

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX041	Transcript of Antron McCray Interview with Julian Breece part 1.docx	2016-10-19	DEFS022379	DEFS022400	* FRE 802
DX042	Transcript of Antron McCray Interview with Julian Breece part 2.docx	2016-10-19	DEFS022408	DEFS022430	* FRE 802
DX043	Transcript of Kevin Richardson Interview with Julian Breece.docx	2016-10-19	DEFS022438	DEFS022465	* FRE 802
DX044	Transcript of Raymond Santana Interview with Julian Breece Part2.docx	2016-10-19	DEFS022470	DEFS022483	* FRE 802
DX045	Transcript of Raymond Santana Interview with Julian Breece Part1.docx	2016-10-19	DEFS022484	DEFS022494	* FRE 802
DX046	Audio of Kevin Richardson Interview with Ava DuVernay and Julian Breece		DEFS022521	DEFS022521	* FRE 802
DX046B	Transcript of Kevin Richardson Interview with Ava DuVernay and Julian Breece prepared at the direction of Defendants' counsel		Forthcoming		FRE 106
DX047	Audio of Korey Wise Interview with Ava DuVernay and Julian Breece.m4a		DEFS022522	DEFS022522	* FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX047B	Excerpt of transcript of Korey Wise Interview with Ava DuVernay and Julian Breece prepared by stenographer at the direction of Defendants' counsel		Forthcoming		FRE 106
DX0048	Audio of Michael Warren Interview with Ava DuVernay and Julian Breece Pt. 1.m4a		DEFS022523	DEFS022523	* FRE 802
DX048B	Excerpt of transcript of Michael Warren Interview with Ava DuVernay and Julian Breece Pt. 1 prepared by stenographer at the direction of Defendants' counsel		Forthcoming		FRE 106
DX049	Audio of Michael Warren Interview with Ava DuVernay and Julian Breece Pt. 2.m4a		DEFS022524	DEFS022524	* FRE 802
DX049B	Excerpt of transcript of Michael Warren Interview with Ava DuVernay and Julian Breece Pt. 2 prepared by stenographer at the direction of Defendants' counsel		Forthcoming		FRE 106
DX050	Audio of Raymond Santana Interview with Ava DuVernay and Julian Breece Part 2.m4a		DEFS022535	DEFS022535	* FRE 802
DX050B	Excerpt of transcript of Raymond Santana Interview with Ava DuVernay and Julian Breece Part 2 prepared by stenographer at the direction of Defendants' counsel		Forthcoming		FRE 106

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX051	Audio of Raymond Santana Interview with Ava DuVernay and Julian Breece Part 1.m4a		DEFS022536	DEFS022536	* FRE 802
DX051B	Excerpt of transcript of Raymond Santana Interview with Ava DuVernay and Julian Breece Part 1 prepared by stenographer at the direction of Defendants' counsel		Forthcoming		FRE 106
DX052	Transcript of Kevin Richardson Interview with Ava DuVernay and Julian Breece.docx	2017-09-22	DEFS022550	DEFS022571	* FRE 802
DX053	Transcript of Korey Wise Interview with Ava DuVernay and Julian Breece.docx	2017-09-05	DEFS022580	DEFS022589	* FRE 802
DX054	Transcript of Michael Warren Interview with Ava DuVernay and Julian BreecePart 1.docx	2016-10-21	DEFS022593	DEFS022601	* FRE 802
DX055	Transcript of Michael Warren Interview with Ava DuVernay and Julian Breece Part 2.docx	2016-10-25	DEFS022602	DEFS022611	* FRE 802
DX056	Transcript of Raymond Santana Interview with Ava DuVernay and Julian Breece Part 1.docx	2016-11-02	DEFS022614	DEFS022632	* FRE 802
DX057	Transcript of Raymond Interview with Ava DuVernay and Julian Breece Part 2.docx	2016-11-07	DEFS022656	DEFS022670	* FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX058	Suppression Hearing Transcripts Volume 1--pages 2-744.pdf		DEFS023350	DEFS024093	* FRE 802
DX059	Suppression Hearing Transcripts Volume 2--pages 744-1458.pdf		DEFS027252	DEFS027968	* FRE 802
DX060	Suppression Hearing Transcripts Volume 3--pages 1459-2163.pdf		DEFS024094	DEFS024804	* FRE 802
DX061	Suppression Hearing Transcripts Volume 4--pages 2164-2612.pdf		DEFS024805	DEFS025255	* FRE 802
DX062	Suppression Hearing Transcripts Volume 5--pages 2613-3334.pdf		DEFS025256	DEFS025982	* FRE 802
DX063	Suppression Hearing Transcripts Volume 6--pages 3335-3955.pdf		DEFS025983	DEFS026605	* FRE 802
DX064	Suppression Hearing Transcripts Volume 7--pages 3956-4594.pdf		DEFS026606	DEFS027251	* FRE 802
DX065	New York Times archival stories.pdf	Compilation	DEFS039408	DEFS039677	* FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX066	NY Daily News coverage - Central Park Five.pdf	Compilation	DEFS004249	DEFS004326	* FRE 802
DX067	Additional Audio of Antron McCray Interview with Sarah Burns		DEFS145471	DEFS145471	FRE 802
DX068	Audio of Antron McCray Interview with Sarah Burns (480p).mp4		DEFS145472	DEFS145472	FRE 802
DX069	Video of Yusef Salaam Interview with Sarah Burns (404p).mp4		DEFS145473	DEFS145473	FRE 802
DX069B	Excerpt of transcript of Yusef Salaam Interview with Sarah Burns prepared by stenographer at the request of Defendants' counsel	-	Forthcoming		FRE 106
DX070	Video of Korey Wise Interview with Sarah Burns 2 of 2 (404p).mp4		DEFS145474	DEFS145474	FRE 802
DX070B	Excerpt of transcript of Korey Wise Interview with Sarah Burns 2 of 2 prepared by stenographer at the request of Defendants' counsel		Forthcoming		FRE 106
DX071	Video of Raymond Santana Jr Interview with Sarah Burns (404p).mp4		DEFS145475	DEFS145475	FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX071B	Excerpt of transcript of Raymond Santana Jr Interview with Sarah Burns prepared by stenographer at the request of Defendants' counsel		Forthcoming		FRE 106
DX072	Video of Wise Interview with Sarah Burns 1 of 2 (404p).mp4		DEFS145476	DEFS145476	FRE 802
DX072B	Excerpt of transcript of Wise Interview with Sarah Burns 1 of 2 prepared by stenographer at the request of Defendants' counsel		Forthcoming		FRE 106
DX073	Video of Kevin Richardson Interview with Sarah Burns		DEFS145477	DEFS145477	FRE 802
DX073B	Excerpt of transcript of Kevin Richardson Interview with Sarah Burns prepared by stenographer at the request of Defendants' counsel		Forthcoming		FRE 106
DX074	Video of Raymond Santana Sr Interview with Sarah Burns (404p).mp4		DEFS145478	DEFS145478	FRE 802
DX074B	Excerpt of transcript of Raymond Santana Sr Interview with Sarah Burns prepared by stenographer at the request of Defendants' counsel		Forthcoming		FRE 106
DX075	Video of Angela Cuffee Black Interview with Sarah Burns		DEFS145479	DEFS145479	FRE 802 FRE 402, FRE 403

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX075B	Excerpt of transcript of Angela Cuffee Black Interview with Sarah Burns prepared by stenographer at the request of Defendants' counsel		Forthcoming		FRE 106
DX076	Audio of Linda McCray Interview with Ava DuVernay.mp3	2018-04-15	DEFS159760	DEFS159760	* FRE 802 FRE 402, FRE 403
DX077	Audio of Angela Black Interview with Ava DuVernay.mp3	2018-04-13	DEFS159739	DEFS159739	* FRE 802
DX078	Audio of Raymond Santana Sr. Interview with Ava DuVernay.mp3	2018-04-13	DEFS159778	DEFS159778	* FRE 402, FRE 403 FRE 802
DX079	Audio of Sharonne Salaam Interview with Ava DuVernay.mp3	2018-04-14	DEFS159796	DEFS159796	* FRE 402, 403 FRE 802
DX080	Antron McCray videotaped statement	1989-04-21	DEFS159731	DEFS159731	* FRE 402, 403 FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX081	Transcript of Antron McCray videotaped statement	1989-04-21	DEFS037809	DEFS037848	* FRE 402, 403 FRE 802
DX082	Transcript of Korey Wise first videotaped statement	1989-04-21	DEFS055110	DEFS055192	* FRE 402, 403 FRE 802
DX083	Transcript of Korey Wise second videotaped statement	1989-04-21	DEFS036167	DEFS036816	* FRE 402, 403 FRE 802
DX084	Korey Wise second videotaped statement	1989-04-21	DEFS159767	DEFS159767	* FRE 402, 403 FRE 802
DX085	Transcript of Raymond Santana videotaped statement	1989-04-21	DEFS035192	DEFS035230	* FRE 402, 403 FRE 802
DX086	Transcript of Kevin Richardson videotaped statement	1989-04-21	DEFS045841	DEFS045890	* FRE 402, 403 FRE 802
DX087	Kevin Richardson videotaped statement	1989-04-21	DEFS176177	DEFS176177	* FRE 402, 403 FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX088	Clarence Thomas videotaped statement	1989-04-21	DEFS159774	DEFS159774	* FRE 402, 403 FRE 802
DX089	Email from B. Welsh re CP5 research - Matias Reyes confession news timeline.htm	2017-12-02	DEFS082946	DEFS082949	* FRE 802
DX090	Alice McQuillan, "A Monster's Tale," Gruesome details of jogger rapist's confession," N.Y. Daily News	2002-09-25	DEFS176331	DEFS176340	* FRE 802
DX091	Andy Geller, "Why Reyes Admitted Rape: Bid to Win Protection from a Jogger Con," N.Y. Post	2002-12-05	DEFS177119	DEFS177126	* FRE 802
DX092	William K. Rashbaum, "Convicted Killer and Rapist Says He Attacked Central Park Jogger," N. Y. Times	2002-06-12	DEFS176608	DEFS176609	* FRE 402, FRE 403 FRE 802
DX093	Susan Saulny, "3 Seek to Overturn Verdicts in '89 Rape of Park Jogger," N.Y. Times	2002-09-05	DEFS176267	DEFS176268	* FRE 402, FRE 403 FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX094	Barbara Ross and Alice McQuillan, "Who Did It? Jogger Asking Wants the truth on new suspect," N.Y. Daily News	2002-09-04	DEFS177102	DEFS177109	FRE 402, FRE 403 FRE 802 This document was printed/copied in 2021
DX095	Robert D. McFadden and Susan Saulny, "DNA in Central Park Jogger Case Spurs Call for New Review," N.Y. Times	2002-09-06	DEFS176623	DEFS176626	* FRE 402, FRE 403 FRE 802
DX096	"Man Says He was Central Park Rapist," ABC News	2002-09-26	DEFS176683	DEFS176689	FRE 402, FRE 403 FRE 802 This document was printed/copied in 2022
DX097	Sam Roberts, "The Nation: The Central Park Jogger: An Old Case in a Different New York," N.Y. Times	2002-10-20	DEFS177052	DEFS177054	* FRE 402, FRE 403 FRE 802
DX098	"Fooled by stereotypes of superpredators," Chicago Tribune	2002-10-21	DEFS176657	DEFS176659	FRE 402, FRE 403 FRE 802 This is a Westlaw document that was printed/downloaded in 2022

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX099	"Juror Speaks Out Against Convictions in the Central Park Jogger Case: A Meeting Between the Juror and the Mother of One of the Young Men Who Was Sentenced to Ten Years in Prison," Democracy Now	2002-10-31	DEFS176662	DEFS176663	FRE 402, FRE 403 FRE 802
DX100	Jeffrey Toobin, "A Prosecutor Speaks Up," The New Yorker.pdf	2002-11-24	DEFS176110	DEFS176112	**
DX101	N. Ryan, Affirmation in Response to Motion to Vacate Judgment of Conviction, NYCLD_030681 - 030714 (final).pdf		DEFS177229	DEFS177263	* FRE 802
DX102	"Injustice in the Jogger Case," N.Y. Times	2002-12-06	DEFS176703	DEFS176704	FRE 402, FRE 403 FRE 802
DX103	Larry Celona, Dareh Gregorian and Andy Geller, "Detectives Blast Morgenthau Review," N.Y. Post	2002-12-06	DEFS177987	DEFS177988	FRE 402, FRE 403 FRE 802 The metadata for this article says the file was created in 2022.

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX104	Kevin Flynn, "Suspect in Rape Absorbed Pain and Inflicted It," N.Y. Times	2002-12-07	DEFS177045	DEFS177048	* FRE 402, FRE 403 FRE 802
DX105	Ron Stodghill, "True Confession of the Central Park Rapist," <i>TIME</i>	2002-12-09	DEFS177064	DEFS177066	* FRE 402, FRE 403 FRE 802
DX106	Susan Saulny, "Convictions and Charges Voided In '89 Central Park_Jogger Attack," N.Y. Times	2002-12-20	DEFS176610	DEFS176614	* FRE 402, FRE 403 FRE 802
DX107	Jill Smolow, "A Radical Reversal," <i>People</i>	2002-12-23	DEFS176345	DEFS176348	FRE 106 – website banner blocking text FRE 402, FRE 403 FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX108	Email from B. Welsh re CP5 Research - Howard Diller's decision to show the Police tapes in court	2017-12-02	DEFS082942	DEFS082942	* FRE 402, FRE 403 FRE 802
DX109	David Margolick, "THE LAW; Catapulted from obscurity by a teen-age rape suspect whom he actually likes," N.Y. Times	1989-05-12	DEFS177049	DEFS177051	* FRE 402, FRE 403 FRE 802
DX110	"Jogger Suspect: 'I kicked her twice,'" Pittsburgh Press	1990-07-19	DEFS176690	DEFS176691	* FRE 402, FRE 403 FRE 802
DX111	Ronald Sullivan, "3 Youths Guilty of Rape and Assault of Jogger," N.Y. Times	1990-08-08	DEFS176269	DEFS176272	* FRE 402, FRE 403 FRE 802
DX112	Ronald Sullivan, "Jogger Sury Sees Videotaped Confessions," N.Y. Times	1990-11-17	DEFS176660	DEFS176661	* FRE 402, FRE 403 FRE 802
DX113	Email from B. Welsh re CP5 Research - Trump timeline	2017-12-02	DEFS082943	DEFS082945	* FRE 402, FRE 403, FRE 802

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DX114	"Larry King's Interview With Donald Trump and Jackie Mason. Aired 9-10p ET," CNN	1989-05-17	DEFS176664	DEFS176682	* FRE 402, FRE 403, FRE 802
DX115	Oliver Laughland, "Donald Trump and the Central Park Five: the racially charged rise of a demagogue," The Guardian	2016-02-17	DEFS176627	DEFS176640	* FRE 402, FRE 403, FRE 802
DX116	Michael Wilson, "Trump Draws Criticism for Ad He Ran After Jogger Attack," N.Y. Times	2002-10-23	DEFS177067	DEFS177068	* FRE 402, FRE 403, FRE 802
DX117	Donald Trump, "Donald Trump: Central Park Five settlement is a 'disgrace,'" N.Y. Daily News	2014	DEFS176651	DEFS176653	* FRE 402, FRE 403, FRE 802
DX118	Steven A Holmes, "Member of 'Central Park 5' blasts Trump" CNN Politics	2016-10-07	DEFS176692	DEFS176700	* FRE 402, FRE 403, FRE 802
DX119	Brandon E. Pattereson, "Exclusive: Central Park Five Members Blast Trump for Insisting They're Guilty," Mother Jones	2016-10-07	DEFS176654	DEFS176656	* FRE 402, FRE 403, FRE 802
DX120	Yusef Salaam, "Trump won't leave me alone; Imprisoned, exonerated and still haunted," Chicago Tribune	2016-10-13	DEFS177069	DEFS177070	* FRE 402, FRE 403, FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX121	Jeva Lange, "Donald Trump's 30-year crusade against the Central Park Five," The Week	2016-10-07	DEFS176641	DEFS176650	* FRE 402, FRE 403, FRE 802
DX122	Dara Lind, "Timeline: Donald Trump has been getting called racist since 1973," Vox	2015-12-09	DEFS177055	DEFS177063	* FRE 402, FRE 403, FRE 802
DX123	Gregory Kreig, "Sessions: Case of Central Park 5, later exonerated, shows Trump's dedication to 'law and order,'" CNN Politics	2016-11-18	DEFS177039	DEFS177044	* FRE 402, FRE 403, FRE 802
DX124	"What exactly Trump has said about race," PBS News Hours	2020-07-06	DEFS177071	DEFS177101	* FRE 402, FRE 403, FRE 802
DX125	Email chain from Hannah Baker to Ava DuVernay Re: Fairstein Statements	2018-06-02	DEFS093599	DEFS093601	* FRE 802
DX126	John Leland, "Robert Morgenthau on His Years as District Attorney: 'I Don't Look Back,'" N.Y. Times	2016-11-23	DEFS177034	DEFS177038	* FRE 802
DX127	Jeffrey Toobin, "A Prosecutor Speaks Up," The New Yorker.pdf	2002-11-24	DEFS177127	DEFS177129	**

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX128	Linda Fairstein talks new book, 'Central Park 5' case16 - Mp4 Video PDL_HD .mp4	2014-06-20	DEFS176266	DEFS176266	*
DX129	Linda Fairstein Discusses Book - Imus in the Morning, 6-20-14.pdf	2014-06-20	DEFS178013	DEFS178019	The metadata for this transcript states that it was created in 2022
DX130	Andy Geller and Neil Graves, "New Jogger Twist – Silent Witnesses to Gang Attack Back Verdicts," <i>N.Y. Post</i>	2002-12-02	DEFS176701	DEFS176702	* FRE 802
DX131	Andy Geller, "Why Reyes Admitted Rape: Bid to Win Protection from a Jogger Con," <i>N.Y. Post</i>	2002-12-05	DEFS177110	DEFS177118	FRE 106 – website banner blocks text Article saved in May 2022. FRE 402, FRE 403 FRE 802
DX132	CP5 - ABC News Footage - Key Moments - 12.14.17.pdf	2017-12-14	DEFS145497	DEFS145502	* FRE 402, FRE 403 FRE 802

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DX133	ABC News Video Research Key.xls		DEFS145422	DEFS145422	* FRE 402, FRE 403 FRE 802
DX134	FILE 1 - Al Sharpton-Prosecutors at Crime Scene-Arraignment of CP5-Michael Joseph Presser-Defense Pressers (ABC).mov		DEFS145431	DEFS145431	* FRE 402, FRE 403 FRE 802
DX135	FILE 2 - Deliberations Presser-Santana Arrival-Pressers Outside Court-Arrivals-More Pressers (ABC).mov		DEFS145433	DEFS145433	* FRE 402, FRE 403 FRE 802
DX136	FILE 3 - Interview with Richardson Attorney (ABC).mov		DEFS145430	DEFS145430	* FRE 402, FRE 403 FRE 802
DX137	FILE 4 - Salaam_s Attorney Intv-More Pressers-More Arrivals (ABC).mov		DEFS145432	DEFS145432	* FRE 402, FRE 403 FRE 802

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DX138	FILE 5 - Intvs and Pressers-McCray Presser-Demos-Guardian Angels-Pressers on Convictions Overturned (ABC).mov		DEFS145436	DEFS145436	* FRE 402, FRE 403 FRE 802
DX139	FILE 6 - Primetime Live Report on Mattias Reyes Confession (ABC).mov		DEFS145434	DEFS145434	* FRE 402, FRE 403 FRE 802
DX140	FILE 7 - McCray Atty Statements-Demos _ Pressers Clearing CP5-Primetime Report on Mattias Reyes Record (ABC).mov		DEFS145435	DEFS145435	* FRE 402, FRE 403 FRE 802
DX141	FILE 8 - Pressers on Convictions Overturned-Police Presser on Arrests Made (ABC).mov		DEFS145437	DEFS145437	* FRE 402, FRE 403 FRE 802
DX142	FILE 9 - Schomberg Plaza Tenants Association Presser on Gang Violence (ABC).mov		DEFS145429	DEFS145429	* FRE 402, FRE 403 FRE 802

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DX143	Sheehan @ Crime Scene with Fairstein, Lederer et al.mp4		DEFS159797	DEFS159797	* FRE 402, FRE 403 FRE 802
DX144	CP5 - NBC News Footage - Key Moments - 12.26.17.pdf	2017-12-27	DEFS145509	DEFS145511	* FRE 402, FRE 403 FRE 802
DX145	1. Today's Update Segment_BITC_MN17L10501-001_NY-TDY-20090420_8hr (NBC).mov		DEFS145410	DEFS145410	* FRE 402, FRE 403 FRE 802
DX146	2. Compilation of Juvenile Sexual Violence_BITC_MN17L10501-001_WO1 (NBC).mov		DEFS145411	DEFS145411	* FRE 402, FRE 403 FRE 802
DX147	3. Donald Trump_BITC_SN17B9147-052_WNBC_SHOW_L890506230 (NBC).mov		DEFS145409	DEFS145409	* FRE 402, FRE 403 FRE 802
DX148	4. Rehema Ellis Segment_DDM15L7310-005_NY-NN-20021205-0001 (NBC).mov		DEFS145413	DEFS145413	* FRE 402, FRE 403 FRE 802

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DX149	5. Al Sharpton Segments_DDM15L7310-006_WO6 (NBC).mov		DEFS145416	DEFS145416	* FRE 402, FRE 403 FRE 802
DX150	6. Repeat Footage_SN15F6487-008_WO8 (NBC).mov		DEFS145414	DEFS145414	* FRE 402, FRE 403 FRE 802
DX151	7. Repeat and Unrelated Footage_SN16K8729-030_WO30 (NBC).mov		DEFS145415	DEFS145415	* FRE 402, FRE 403 FRE 802
DX152	8. Al Sharpton and Protestors_SN15F6487-015_90H1864 (NBC).mov		DEFS145412	DEFS145412	* FRE 402, FRE 403 FRE 802
DX153	CP5 - NBC News Footage - Key Moments - 01.07.18.pdf	2018-01-07	DEFS145485	DEFS145488	* FRE 402, FRE 403 FRE 802
DX154	3. Donald Trump_BITC_MN17L10501-004_SD_L89050623001A.mov		DEFS159729	DEFS159729	*

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					FRE 402, FRE 403 FRE 802
DX155	10. BITC_MN17L10501-003_WO3.mov		DEFS159777	DEFS159777	* FRE 402, FRE 403 FRE 802
DX156	11. Jury Questions_BITC_MN17L10501-004_SD_L90081618001A.mov		DEFS159728	DEFS159728	* FRE 402, FRE 403 FRE 802
DX157	12. First Trial Verdict_BITC_MN17L10501-004_SD_L90082018001A_p1.mov		DEFS159779	DEFS159779	* FRE 402, FRE 403 FRE 802
DX158	13. Det. McKenna_BITC_MN17L10501-004_SD_L90082018001A_p2.mov		DEFS159741	DEFS159741	* FRE 402, FRE 403 FRE 802
DX159	14. Trial 2 Coverage_BITC_MN17L10501-004_SD_L90111518001A.mov		DEFS159744	DEFS159744	* FRE 402, FRE 403 FRE 802

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DX160	15. Reactions to Trial 2_BITC_MN17L10501- 004_SD_L90121118001A.mov		DEFS159726	DEFS159726	* FRE 402, FRE 403 FRE 802
DX161	16. Juror Interview_BITC_MN17L10501- 004_SD_L90121218001A.mov		DEFS159730	DEFS159730	* FRE 402, FRE 403 FRE 802
DX162	17. Jerry Nachum Segment_BITC_MN17L10501- 004_SD_MNBC-NACH- 20020926_19hr.mov		DEFS159782	DEFS159782	* FRE 402, FRE 403 FRE 802
DX163	18. Repeat Footage_BITC_MN17L10501- 004_SD_NY-19980123-0058.mov		DEFS159727	DEFS159727	* FRE 402, FRE 403 FRE 802
DX164	CP5 - CBS News Footage - Key Moments - 12.18.17.pdf	2017-12-18	DEFS145504	DEFS145504	* FRE 402, FRE 403 FRE 802
DX165	1. Trisha Meili Segment_2B10961DC_001_mc- ovnm,ovtc,wmtc.mov		DEFS145438	DEFS145438	* FRE 402, FRE 403 FRE 802

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DX166	2. Trisha Meili Interview_2B10733AF_xxx_mc- ovnm,ovtc,wmtc.mov		DEFS159773	DEFS159773	* FRE 402, FRE 403 FRE 802
DX167	2B10733AF_xxx_mc- ovnm,ovtc,wmtc.mov		DEFS145441	DEFS145441	* FRE 402, FRE 403 FRE 802
DX168	3. The Early Show_2B1107CA4_xxx_mc- ovnm,ovtc,wmtc.mov		DEFS145440	DEFS145440	* FRE 402, FRE 403 FRE 802
DX169	4. Repeat Footage_2B1045A90_xxx_mc- ovnm,ovtc,wmtc.mov		DEFS145444	DEFS145444	* FRE 402, FRE 403 FRE 802
DX170	5. Short Clips_2B1078F50_s03_mc- ovnm,ovtc,wmtc.mov		DEFS145439	DEFS145439	* FRE 402, FRE 403 FRE 802
DX171	6. Colin Moore_2B10AF602_s01_mc- ovnm,ovtc,wmtc.mov		DEFS145442	DEFS145442	* FRE 402, FRE 403 FRE 802

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DX172	7. Fairstein_2B111E3C2_xxx_mc-ovnm,ovtc,wmte.mov		DEFS145443	DEFS145443	* FRE 402, FRE 403 FRE 802
DX173	CP5 - CNN News Footage - Key Moments - 12.19.17.pdf	2017-12-19	DEFS145505	DEFS145506	* FRE 402, FRE 403 FRE 802
DX174	CP5 - CNN Selects.pdf	2017-12-13	DEFS145507	DEFS145508	* FRE 402, FRE 403 FRE 802
DX175	1. 12320129_CENTRAL_PARK_5___TRU MP_ariley_03.mov		DEFS145469	DEFS145469	* FRE 402, FRE 403 FRE 802
DX176	2. 90101309_WILDING_ariley.mov		DEFS145468	DEFS145468	* FRE 402, FRE 403 FRE 802

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DX177	3. 90102522_CENTRAL_PARK_ATTACK_ariley.mov		DEFS145459	DEFS145459	* FRE 402, FRE 403 FRE 802
DX178	4. 90104154_JOGGER_ariley.mov		DEFS145457	DEFS145457	* FRE 402, FRE 403 FRE 802
DX179	5. 90318630_tc_wm_lores.mov		DEFS145448	DEFS145448	* FRE 402, FRE 403 FRE 802
DX180	6. 90345218_tc_wm_lores.mov		DEFS145455	DEFS145455	* FRE 402, FRE 403 FRE 802
DX181	7. 90346157_tc_wm_lores.mov		DEFS145467	DEFS145467	* FRE 402, FRE 403 FRE 802
DX182	8. 90346734_tc_wm_lores.mov		DEFS145460	DEFS145460	* FRE 402, FRE 403 FRE 802

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DX183	9. 90347178_tc_wm_lores.mov		DEFS145456	DEFS145456	* FRE 402, FRE 403 FRE 802
DX184	10. 90347983_tc_wm_lores.mov		DEFS145462	DEFS145462	* FRE 402, FRE 403 FRE 802
DX185	11. 90348150_tc_wm_lores.mov		DEFS145465	DEFS145465	* FRE 402, FRE 403 FRE 802
DX186	12. 90348431_tc_wm_lores.mov		DEFS145449	DEFS145449	* FRE 402, FRE 403 FRE 802
DX187	13. 90349369_tc_wm_lores.mov		DEFS145463	DEFS145463	* FRE 402, FRE 403 FRE 802
DX188	14. 90349636_tc_wm_lores.mov		DEFS145461	DEFS145461	* FRE 402, FRE 403 FRE 802

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DX189	15. 90350567_tc_wm_lores.mov		DEFS145452	DEFS145452	* FRE 402, FRE 403 FRE 802
DX190	16. 90357569_CENTRAL_PARK_JOGGER_ariley.mov		DEFS145464	DEFS145464	* FRE 402, FRE 403 FRE 802
DX191	17. 90365499_tc_wm_lores.mov		DEFS145454	DEFS145454	* FRE 402, FRE 403 FRE 802
DX192	18. 90369871_tc_wm_lores.mov		DEFS145445	DEFS145445	* FRE 402, FRE 403 FRE 802
DX193	19. 90371338_tc_wm_lores.mov		DEFS145453	DEFS145453	* FRE 402, FRE 403 FRE 802
DX194	20. 90372064_tc_wm_lores.mov		DEFS145447	DEFS145447	* FRE 402, FRE 403 FRE 802

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DX195	21. 90373869_tc_wm_lores.mov		DEFS145466	DEFS145466	* FRE 402, FRE 403 FRE 802
DX196	22. 90373898_JOGGER_VERDICT_ariley.mov		DEFS145458	DEFS145458	* FRE 402, FRE 403 FRE 802
DX197	23. 90378230_tc_wm_lores.mov		DEFS145446	DEFS145446	* FRE 402, FRE 403 FRE 802
DX198	24. 92603801_tc_wm_lores.mov		DEFS145470	DEFS145470	* FRE 402, FRE 403 FRE 802
DX199	CP5 - Fox Video Research Guide.pdf	2018-03-20	DEFS159811	DEFS159811	* FRE 402, FRE 403 FRE 802
DX200	1. Dramatic Reenactment_RAW-CENTRALPARKJOGGERACA-1GF6FJDA_ARCHIVEPREV.mp4		DEFS145420	DEFS145420	* FRE 402, FRE 403 FRE 802

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DX201	2. RAW-CENTRALPARKJOGGERHISTORY-2DFR9LAA_ARCHIVEPREV.mp4		DEFS145417	DEFS145417	* FRE 402, FRE 403 FRE 802
DX202	3. RAW-CENTRALPARKJOGGERTEENS-3Q1TEW4A_ARCHIVEPREV.mp4		DEFS145421	DEFS145421	* FRE 402, FRE 403 FRE 802
DX203	4. RAW-CENTRALPARKJOGGERVERDICT-2DFR8JYA_ARCHIVEPREV.mp4		DEFS145419	DEFS145419	* FRE 402, FRE 403 FRE 802
DX204	5. RAW-TRUMPCENTRALVSKOCHPARKFIVED EATH-1WU2EFFA_ARCHIVEPREV.mp4		DEFS145418	DEFS145418	* FRE 402, FRE 403 FRE 802
DX205	CP5 - Video Research Footage - Kevins and Cuffees.mp4		DEFS159725	DEFS159725	* FRE 402, FRE 403 FRE 802
DX206	CP5 - Video Research Footage - Antron and McCrays.mp4		DEFS159742	DEFS159742	* FRE 402, FRE 403 FRE 802

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DX207	CP5 - Video Research Footage - Yusef and Sharonne.mp4		DEFS159743	DEFS159743	* FRE 402, FRE 403 FRE 802
DX208	CP5 - Video Research Footage - Raymond and Santanas.mp4		DEFS159759	DEFS159759	* FRE 402, FRE 403 FRE 802
DX209	CP5 - Video Research Footage - Korey and Deloris.mp4		DEFS159793	DEFS159793	* FRE 402, FRE 403 FRE 802
DX210	Lederer News Moments.pdf		DEFS159737	DEFS159737	* FRE 402, FRE 403 FRE 802
DX211	Description of group of 30 kids harassing ppl at 36s to 52s.mp3		DEFS159776	DEFS159776	* FRE 402, FRE 403 FRE 802
DX212	Doc 12_001.pdf - Central park jogger case Wikipedia	2017-10-19	DEFS009030	DEFS009047	* FRE 402, FRE 403 FRE 802

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DX213	Doc 13_001.pdf - Linda Fairstein Wikipedia	2017-10-19	DEFS009048	DEFS009052	* FRE 802
DX214	Attica Folder - Douglas Starr, "The Interview," The New Yorker	2013-12-09	DEFS035386	DEFS035403	* FRE 402, FRE 403 FRE 802
DX215	Douglas Starr, "The Interview," The New Yorker	2013-12-09	DEFS037304	DEFS037324	* FRE 402, FRE 403 FRE 802
DX216	Rachel Aviv, "Remembering The Murder You Didn't Commit"	2017-06-19	DEFS036761	DEFS036778	FRE 402, FRE 403 FRE 802
DX217	CP5 - Armstrong Report.pdf	2003-01	DEFS010080	DEFS010122	* FRE 802
DX218	<i>The Central Park Five</i> , by Sarah Burns		DEFS037047	DEFS037303	* FRE 802
DX219	<i>Unequal Verdicts: The Central Park Jogger Trials</i> , by Timothy Sullivan		DEFS037478	DEFS037808	* FRE 802
DX220	Email from I. Katz to A. Locke re: CP5 - Sarah Burns video interviews	2017-10-09	DEFS082869	DEFS082871	*

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DX221	Attica Locke's Central Park Five Writers' Room Binder	Compilation	DEFS138166	DEFS138711	**
DX222	Attica Locke's Central Park Five Research Binder	Compilation	DEFS138712	DEFS138803	* FRE 802
DX223	Legal Timeline	undated	DEFS035647	DEFS035655	**
DX224	A. Locke Handwritten Notes	2017-10-10 to 2017-10-30	DEFS036189	DEFS036313	* FRE 402, FRE 802
DX225	Alice McQuillan, "A Monster's Tale," Gruesome details of jogger rapist's confession," New York Daily News	2002-09-26	DEFS000461	DEFS000463	* FRE 402, FRE 403, FRE 802
DX226	Lived a dream life - NY Daily News.pdf	1989-04-21	DEFS000471	DEFS000473	* FRE 402, FRE 403 FRE 802
DX227	Central Park jogger near death after savage attack in 1989 - NY Daily News.pdf	1989-04-21	DEFS000484	DEFS000488	* FRE 402, FRE 403 FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX228	The Climate_ New York in 1989 - NY Daily News.pdf	2013-04-08	DEFS000489	DEFS000491	* FRE 402, FRE 403 FRE 802
DX229	Transcript of Korey Wise interview with Ava DuVernay and Julian Breece.docx	2017-09-05	DEFS000492	DEFS000501	* FRE 802
DX230	Transcript of Raymond Santana Part 2 interview with Ava DuVernay and Julian Breece.docx	2016-11-07	DEFS000502	DEFS000516	* FRE 802
DX231	Transcript of Kevin Richardson interview with Ava DuVernay and Julian Breece.docx	2017-09-22	DEFS000517	DEFS000538	* FRE 802
DX232	Transcript of Raymond Santana Part 1 interview with Ava DuVernay and Julian Breece.docx	2016-11-02	DEFS000539	DEFS000557	* FRE 802
DX233	Transcript of Michael Warren Part 1 interview with Ava DuVernay and Julian Breece.docx	2016-10-21	DEFS000558	DEFS000566	* FRE 802
DX234	Transcript of Michael Warren Part 2 interview with Ava DuVernay and Julian Breece.docx	2016-10-25	DEFS000567	DEFS000576	* FRE 802
DX235	Audio of Raymond Santana Part 2 interview with Ava DuVernay and Julian Breece.m4a	Undated	DEFS000577	DEFS000577	* FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX236	Audio of Raymond Santana Part 1 interview with Ava DuVernay and Julian Breece.m4a	Undated	DEFS000578	DEFS000578	* FRE 802
DX237	Audio of Kevin Richardson interview with Ava DuVernay and Julian Breece.m4a	Undated	DEFS000579	DEFS000579	* FRE 802
DX238	Audio of Transcript of Michael Warren Part 1 interview with Ava DuVernay and Julian Breece.m4a	Undated	DEFS000580	DEFS000580	* FRE 802
DX239	Audio of Korey Wise interview with Ava DuVernay and Julian Breece.m4a	Undated	DEFS000581	DEFS000581	* FRE 802
DX240	Audio of Michael Warren Part 2 interview with Ava DuVernay and Julian Breece.m4a	Undated	DEFS000582	DEFS000582	* FRE 802
DX241	Transcript of Kevin Richardson interview with Julian Breece.docx	2016-10-19	DEFS000583	DEFS000610	* FRE 802
DX242	Transcript of Antron McCray Part 1 interview with Julian Breece.docx	2016-10-19	DEFS000611	DEFS000632	* FRE 802
DX243	Transcript of Raymond Santana Part 2 interview with Julian Breece.docx	2016-10-19	DEFS000633	DEFS000646	* FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX244	Transcript of Raymond Santana Part 1 interview with Julian Breece.docx	2016-10-19	DEFS000658	DEFS000668	* FRE 802
DX245	Transcript of Antron McCray Part 2 interview with Julian Breece.docx	2016-10-19	DEFS000669	DEFS000691	* FRE 802
DX246	Audio of Raymond Santana Part 2 interview with Julian Breece.mp3	Undated	DEFS000715	DEFS000715	* FRE 802
DX247	Audio of Antron McCray Part 1 interview with Julian Breece.mp3	Undated	DEFS000716	DEFS000716	* FRE 802
DX248	Audio of Raymond Santana Part 1 interview with Julian Breece.mp3	Undated	DEFS000717	DEFS000717	* FRE 802
DX249	Audio of Kevin Richardson interview with Julian Breece.mp3	Undated	DEFS000718	DEFS000718	* FRE 802
DX250	Audio of Antron McCray Part 2 interview with Julian Breece.mp3	Undated	DEFS000719	DEFS000719	* FRE 802
DX251	Electronic Copy of Central Park Five Research Binder	2017-09-29	DEFS003850	DEFS004647	* FRE 802
DX252	Robin Swicord's Central Park Five Research Binder	Undated	DEFS006947	DEFS007495	** FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX253	Robin Swicord Writers' Room Binder	Undated	DEFS005074	DEFS005656	**
DX254	Re CP5 - Sarah Burns video interviews.htm	2017-10-09	DEFS163020	DEFS163020	FRE 802
DX255	<i>Unequal Verdicts: The Central Park Jogger Trials</i> by Timothy Sullivan (handwritten notes and markings original to Ms. Swicord)	1995-06-14	DEFS168809	DEFS168976	* FRE 802
DX256	<i>The Central Park Five: The Untold Story Behind One of New York's Most Infamous Crimes</i> by Sarah Burns (handwritten notes and markings original to Ms. Swicord)	2012-04	DEFS168672	DEFS168808	* FRE 802
DX257	<i>Savage Portrayals: Race, Media, & the Central Park Jogger Story</i> by Natalie Byfield (handwritten notes and markings original to Ms. Swicord)	undated	DEFS168547	DEFS168671	* FRE 802
DX258	<i>Essentials of the Reid Technique, Criminal Interrogation and Confessions</i> by Fred E. Inbau et al.		DEFS009869	DEFS009869	* FRE 802 FRE 402, 403
DX259	Douglas Starr, "The Interview," <i>The New Yorker</i> (handwriting original to Ms. Swicord)	2013-12-09	DEFS009229	DEFS009243	* FRE 802. FRE 402, 403

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX260	Email from R. Swicord to A. Locke re: coerced confessions - how the misinformation flowed with attachment "Letter to Attica about coerced confessions"	2017-12-18	DEFS092969	DEFS092974	**
DX261	Doc3_001.pdf - 2017.12.12 CP5 Key Detective List with handwritten notes	1900-07-19	DEFS007728	DEFS007730	**
DX262	Handwritten notes from Oct. 2017	2017-10	DEFS007786	DEFS007826	*
DX263	CP5 Folder_001.pdf - Armstrong Report	2003-01	DEFS008875	DEFS008917	*
DX264	Email string from R. Swicord to Lori Hironaka re: Wise notes from 11/18/2017	2017-11-17	DEFS009145	DEFS009228	**
DX265	Doc 2_001.pdf - Rachel Aviv, "Remembering the Murder You Didn't Commit," The New Yorker (June 19, 2017)	2017-06-19	DEFS009244	DEFS009276	* FRE 402, FRE 403 FRE 802
DX266	Doc 1_001.pdf - Elizabeth A. Harris, "For Men Cleared in Jogger Case, Belated Pomp and Circumstance," New York Times (June 26, 2017)	2017-06-26	DEFS009282	DEFS009284	* FRE 402, FRE 403 FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX267	Doc 2_001.pdf - "Injustice in the Jogger Case," New York Times (Dec. 6, 2002)	2002-12-06	DEFS009285	DEFS009286	* FRE 402, FRE 403 FRE 802
DX268	Doc 3_001.pdf - Kevin Flynn, "Suspect in Rape Absorbed Pain and Inflicted It," New York Times (Dec. 7, 2002)	2002-12-07	DEFS009287	DEFS009291	* FRE 802 FRE 402, FRE 403
DX269	Jill Smolow, "A Radical Reversal," <i>People</i>	2002-12-23	DEFS009294	DEFS009296	FRE 106 Document is illegible because words are cut off. FRE 402, FRE 403 FRE 802
DX270	Doc 6_001.pdf - Susan Saulny, "Convictions and Charges Voided in '89 Central Park Jogger Attack," New York Times (Dec. 20, 2002)	2002-12-20	DEFS009297	DEFS009301	* FRE 402, FRE 403 FRE 802
DX271	Doc 7_001.pdf - Matias Reyes Timeline		DEFS009302	DEFS009307	* FRE 402, FRE 403 FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX272	Doc 8_001.pdf - Alice McQuillan, "A Monster's Tale," Gruesome details of jogger rapist's confession," New York Daily News (Sept. 26, 2002)	2002-09-26	DEFS009308	DEFS009309	* FRE 402, FRE 403 FRE 802
DX273	Doc 4_001.pdf - Ron Stodghill, "The Confession of the Central Park Rapist," TIME (Dec. 9, 2002)	2002-12-09	DEFS009292	DEFS009293	* FRE 106 Document illegible FRE 402, FRE 403 FRE 802
DX274	Notes 5_001.pdf - Robin Swicord Handwritten Notes		DEFS009694	DEFS009725	* FRE 402, FRE 403, FRE 802
DX275	Defendant Ava DuVernay's First Supplemental Responses and Objections to Plaintiff's First Set of Interrogatories	2022-01-31			**
DX276	Defendant Ava DuVernay's Supplemental Responses and Objections to Plaintiff's Second Set of Interrogatories	2022-06-06			**

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX277	Defendant Attica Locke's First Supplemental Responses and Objections to Plaintiff's First Set of Interrogatories	2022-01-31			**
DX278	Defendant Attica Locke's Supplemental Responses and Objections to Plaintiff's Second Set of Interrogatories	2022-06-21			**
DX279	Defendant Netflix, Inc.'s Responses and Objections to Plaintiff's First Set of Interrogatories				**
DX280	Defendant Netflix, Inc.'s Supplemental Responses and Objections to Plaintiff's Second Set of Interrogatories	2022-06-22			**
DX281	Ava DuVernay's initial outline	undated	DEFS168977	DEFS168978	*
DX282	1.) CP5 - DuVernay Format Document Part 1-5 - 01.03.18.pdf	2018-01-03	DEFS031900	DEFS031906	**
DX283	2.) CP5 - Swicord - PART 1 - DRAFT 1 - 01.03.18.pdf	2018-01-03	DEFS033792	DEFS033895	*
DX284	3.) CP5 - Swicord - Part 1 - Draft 2 - 01.18.18.pdf	2018-01-18	DEFS033225	DEFS033321	*
DX285	4.) CP5 - Swicord - Part 1 - Draft 2 Polish - 1.28.18 - Starred _ Proofed.pdf	2018-01-28	DEFS032407	DEFS032500	*

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX286	5.) CP5 - DuVernay - Part 1 - Draft 1 ReShape - 02.16.18.pdf	2018-02-16	DEFS033322	DEFS033408	*
DX287	6.) CP5 - DuVernay - Part 1 - Draft 2 - 03.26.18 - Proofed.pdf	2018-03-26	DEFS033125	DEFS033224	*
DX288	7.) CP5 - DuVernay - Part 1 - Draft 2 Polish - 03.27.18 - Proofed _ Clean.pdf	2018-03-27	DEFS032939	DEFS033035	*
DX289	8.) CP5 - DuVernay - Part 1 - Draft 3 - 04.06.18.pdf	2018-04-06	DEFS032501	DEFS032598	*
DX290	9.) CP5 - DuVernay - Part 1 - Draft 4 - 04.13.18 - Proofed _ Clean.pdf	2018-04-13	DEFS033409	DEFS033497	*
DX291	10.) CP5 - DuVernay - Part 1 - Draft 5 - 04.25.18.pdf	2018-04-25	DEFS033498	DEFS033587	*
DX292	11.) CP5 - DuVernay - Part 1 - Draft 6 - 05.07.18.pdf	2018-05-07	DEFS033036	DEFS033124	*
DX293	12.) CP5 - Swicord - Part 1 - Revisions - 05.29.18.pdf	2018-05-29	DEFS032780	DEFS032861	*
DX294	13.) DuVernay - Part 1 - Draft 7 - 06.01.18.pdf	2018-06-01	DEFS032862	DEFS032938	*
DX295	14.) CP5 - DuVernay - Part 1 - Draft 8 - 06.18.18.pdf	2018-06-18	DEFS032626	DEFS032702	*
DX296	15.) CENTRAL PARK - PART ONE - White Draft - 06.19.18.pdf	2018-06-19	DEFS032703	DEFS032779	*

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX297	16.) CINQ SCRIPT P1 FULL BLUE DRAFT 6.27.18.pdf	2018-06-27	DEFS033714	DEFS033791	*
DX298	17.) CINQ SCRIPT P1 PINK REVISED PAGES 7.11.18.pdf	2018-07-11	DEFS032393	DEFS032406	*
DX299	CINQ SCRIPT P1 PINK COLLATED DRAFT 7.11.18.pdf	2018-07-11	DEFS001972	DEFS002051	*
DX300	18.) CINQ SCRIPT P1 YELLOW REVISED PAGES 7.24.18.pdf	2018-07-24	DEFS033675	DEFS033713	*
DX301	CINQ SCRIPT P1 YELLOW COLLATED DRAFT 7.24.18.pdf	2018-07-24	DEFS001860	DEFS001947	*
DX302	19.) CINQ SCRIPT P1 GREEN REVISED PAGES 8.5.18.pdf	2018-08-05	DEFS032599	DEFS032625	*
DX303	CINQ SCRIPT P1 GREEN COLLATED DRAFT 8.5.18.pdf	2018-08-05	DEFS002828	DEFS002914	*
DX304	20.) CINQ SCRIPT P1 2ND WHITE PAGES 8.13.18.pdf	2018-08-13	DEFS032391	DEFS032392	*
DX305	CINQ SCRIPT P1 2ND WHITE COLLATED DRAFT 8.13.18.pdf	2018-08-13	DEFS002052	DEFS002138	*
DX306	21.) CINQ SCRIPT P1 - 2ND BLUE COLLATED DRAFT 9.19.18.pdf	2018-09-19	DEFS033588	DEFS033674	*
DX307	2.) CP5 - Locke - Part 2 - Draft 1 - 01.03.18.pdf	2018-01-03	DEFS034801	DEFS034928	*

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX308	3.) CP5 - Locke - Part 2 - Draft 2 - 01.19.18.pdf	2018-01-19	DEFS034929	DEFS035029	*
DX309	4.) CP5 - Locke - Part 2 - Draft 2 Polish - 01.28.18 - Proofed _ Clean.pdf	2018-01-28	DEFS034448	DEFS034548	*
DX310	5.) CP5 - DuVernay - Part 2 - Draft 1 - 03.27.18.pdf	2018-03-27	DEFS034625	DEFS034721	*
DX311	6.) CP5 - Locke - Part 2 - Revisions 1 - 04.02.18.pdf	2018-04-02	DEFS035030	DEFS035113	*
DX312	7.) CP5 - DuVernay - Part 2 - Draft 2 - 04.13.18.pdf	2018-04-13	DEFS034722	DEFS034800	*
DX313	8.) CP5 - DuVernay - Part 2 - Draft 3 - 05.07.18.pdf	2018-05-07	DEFS034045	DEFS034122	*
DX314	9.) CP5 - Spiegel - Part 2 - Revisions - 06.05.18.pdf	2018-06-05	DEFS034549	DEFS034624	*
DX315	10.) CP5 - DuVernay - Part 2 - Draft 4 - 06.12.18.pdf	2018-06-12	DEFS033896	DEFS033969	*
DX316	11.) Starrbury - Part 2 - Revisions - 06.14.18.pdf	2018-06-14	DEFS033970	DEFS034039	*
DX317	12.) CP5 - DuVernay - Part 2 - Draft 5 - 06.16.18 - Proofed.pdf	2018-06-16	DEFS034381	DEFS034447	*
DX318	13.) CP5 - DuVernay - Part 2 - Draft 6 - 06.19.18.pdf	2018-06-19	DEFS034181	DEFS034247	*

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX319	14.) CENTRAL PARK - PART TWO - White Draft - 06.20.18.pdf	2018-06-20	DEFS034248	DEFS034314	*
DX320	15.) CINQ SCRIPT P2 FULL BLUE DRAFT 7.1.18.pdf	2018-07-01	DEFS034315	DEFS034380	*
DX321	16.) CINQ SCRIPT P2 PINK REVISED PAGES 7.11.18.pdf	2018-07-11	DEFS034170	DEFS034180	*
DX322	CINQ SCRIPT P2 PINK COLLATED DRAFT 7.11.18.pdf	2018-07-11	DEFS003688	DEFS003754	*
DX323	17.) CINQ SCRIPT P2 YELLOW REVISED PAGES 7.24.18.pdf	2018-07-24	DEFS034156	DEFS034169	*
DX324	CINQ SCRIPT P2 YELLOW COLLATED DRAFT 7.24.18(1).pdf	2018-07-24	DEFS003619	DEFS003687	*
DX325	18.) CINQ SCRIPT P2 GREEN REVISED PAGES 8.5.18.pdf	2018-08-05	DEFS034136	DEFS034155	*
DX326	CINQ SCRIPT P2 GREEN COLLATED DRAFT 8.5.18.pdf	2018-08-05	DEFS003765	DEFS003837	*
DX327	19.) CINQ SCRIPT P2 2ND WHITE REVISED PAGES 8.24.18.pdf	2018-08-24	DEFS034123	DEFS034135	*
DX328	CINQ SCRIPT P2 2ND WHITE COLLATED DRAFT 8.24.18.pdf	2018-08-24	DEFS002996	DEFS003070	*
DX329	20.) CINQ SCRIPT P2 - 2ND BLUE REVISED PAGES 9.23.18.pdf	2018-09-23	DEFS034040	DEFS034041	*

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DX330	CINQ SCRIPT P2 2ND BLUE COLLATED DRAFT 9.23.18.pdf	2018-09-23	DEFS146146	DEFS146220	*
DX331	21.) CINQ SCRIPT P2 2ND PINK REVISED PAGES 10.25.18.pdf	2018-10-25	DEFS034042	DEFS034044	*
DX332	CINQ SCRIPT P2 2ND PINK COLLATED DRAFT 10.25.18(1).pdf	2018-10-25	DEFS002921	DEFS002995	*
DX333	22.) CINQ SCRIPT P2 2ND YELLOW COLLATED DRAFT 11.2.18 copy.pdf	2018-11-02	DEFS035114	DEFS035191	*
DX334	2.) CP5 - DuVernay - Part 5 - Revised Outline - 04.13.18.pdf	2018-04-13	DEFS031980	DEFS031985	*
DX335	3.) DuVernay _ R. Gay - Part 5 - Pages - 04.19.18.pdf	2018-04-19	DEFS031843	DEFS031899	*
DX336	4.) CP5 - DuVernay - Part 5 - Revised Outline 2 - 05.01.18.pdf	2018-05-01	DEFS031839	DEFS031842	*
DX337	5.) CP5 - DuVernay _ Starrbury - Part 5 - Partial Draft 1 - 05.09.18.pdf	2018-05-09	DEFS032302	DEFS032350	*
DX338	6.) CP5 - DuVernay - Part 4 - Partial Draft 1 - 06.02.18.pdf	2018-06-02	DEFS032165	DEFS032227	*
DX339	7.) CP5 - DuVernay - Part 4 - Revisions - 06.18.18.pdf	2018-06-18	DEFS032102	DEFS032164	*
DX340	8.) CP5 - DuVernay - Part 4 - White Draft - 06.19.18.pdf	2018-06-19	DEFS031917	DEFS031979	*

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX341	9.) DuVernay CINQ SCRIPT P4 FULL BLUE DRAFT 7.10.18.pdf	2018-07-10	DEFS032043	DEFS032101	*
DX342	10.) DuVernay CINQ SCRIPT P4 PINK REVISED PAGES 7.24.18.pdf	2018-07-24	DEFS032011	DEFS032042	*
DX343	CINQ SCRIPT P4 PINK COLLATED DRAFT 7.24.18.pdf	2018-07-24	DEFS001383	DEFS001449	*
DX344	11.) DuVernay CINQ SCRIPT P4 - YELLOW REVISED PAGES 9.18.18.pdf	2018-09-18	DEFS031834	DEFS031838	*
DX345	CINQ SCRIPT P4 YELLOW COLLATED DRAFT 9.18.18.pdf	2018-09-18	DEFS001253	DEFS001319	*
DX346	12.) DuVernay CINQ SCRIPT P4 - GREEN REVISED PAGES 10.3.18.pdf	2018-10-03	DEFS031828	DEFS031833	*
DX347	CINQ SCRIPT P4 GREEN COLLATED DRAFT 10.3.18.pdf	2018-10-03	DEFS000978	DEFS001047	*
DX348	13.) DuVernay CINQ SCRIPT P4 2ND WHITE REV. PAGES 10.17.18.pdf	2018-10-17	DEFS031986	DEFS032010	*
DX349	CINQ SCRIPT P4 2ND WHITE COLLATED DRAFT 10.17.18.pdf	2018-10-17	DEFS073559	DEFS073631	*
DX350	14.) DuVernay CINQ SCRIPT P4 - 2ND BLUE REVISED PAGES 10.24.18.pdf	2018-10-24	DEFS031907	DEFS031916	*
DX351	CINQ SCRIPT P4 - 2ND BLUE COLLATED DRAFT 10.24.18.pdf	2018-10-24	DEFS001180	DEFS001252	*

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DX352	15.) DuVernay CINQ SCRIPT P4 - 2ND PINK COLLATED DRAFT 11.2.18 copy.pdf	2018-11-02	DEFS032228	DEFS032301	*
DX353	Email from M. Matruski Re: PITCH PREP: CENTRAL PARK 5	2017-05-01	DEFS068207	DEFS068207	* FRE 402
DX354	Email Chain re Central Park Five	2017-06-29	DEFS173244	DEFS173247	*
DX355	Initial press release	2017-07-06	DEFS145014	DEFS145015	*
DX356	A. DuVernay Text Chain	2017-07-09	DEFS177582	DEFS177586	* FRE 402, FRE 403
DX357	Email chain Re: CP5 research	2017-10-04	DEFS082858	DEFS082858	* FRE 402, FRE 403 FRE 802
DX358	Structural Breakdown dated October 18, 2017 by Swicord.pdf	2017-10-18	DEFS032351	DEFS032353	* FRE 402, FRE 403
DX359	Central Park Five Part One: Antron / 'Crime' & Police Key Beats / "Yummy Bits"	2017-10-25	DEFS022693	DEFS022702	*
DX360	Central Park Five Part One: Antron / "Crime" & Police Key Beats / "Yummy Bits" Master Doc	2017-10-26	DEFS022728	DEFS022738	*

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX361	Email from H. Baker to A. DuVernay, R. Swicord, A. Locke and T. Bradshaw attaching CP5 Interview Questions 10.27.17.pdf; CP5 - Day 3 - 10.27.17 - Room Notes - Compiled.pdf; CPS Secondary Law Enforcement Characters 10.27.17.pdf; Interrogation Timeline - DAY THREE - 10.27.17 2.pdf	2017-10-27	DEFS083202	DEFS083232	**
DX362	October 27, 2017 Writers' Room Notes	2017-10-27	DEFS022759	DEFS0022778	**
DX363	October 30, 2017 Writers' Room Notes	2017-10-30	DEFS022795	DEFS022829	**
DX364	Email from A. Locke re: Litigation Timeline	2017-11-14	DEFS088523	DEFS088532	*
DX365	Email from R. Swicord to A. DuVernay re: Korey transcripts	2017-11-18	DEFS093375	DEFS093375	**
DX366	Ep 1 Story Outline dated Nov 19, 2017 by Swicord.pdf	2017-11-19	DEFS032354	DEFS032375	*
DX367	Ep 2 Outline dated November 24, 2017 by Locke.pdf	2017-11-24	DEFS032376	DEFS032390	**
DX368	Email from R. Swicord to A. Locke re: script revisions	2017-12-09	DEFS159395	DEFS159395	*
DX369	Email from A. Locke to R. Swicord re: backstory	2017-12-30	DEFS082915	DEFS082916	**

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX370	January 8, 2018 Central Park Five Writers' Room Notes	2018-01-08	DEFS021412	DEFS021426	**
DX371	January 24, 2018 Central Park Five Writer's Room Notes	2018-01-24	DEFS022401	DEFS022407	**
DX372	Email from H. Baker to A. DuVernay re: CP5 Netflix Notes 02.06.18 attaching call notes	2018-02-10	DEFS105016	DEFS105019	**
DX373	February 10, 2018 Central Park Five Writing notes	2018-02-10	DEFS022431	DEFS022437	**
DX374	Email chain between A. DuVernay, B. Welsh and H. Baker re: Draft of note to rep	2018-04-24	DEFS093379	DEFS093379	**
DX375	Casting Press Release Notes	Undated	DEFS003840	DEFS003843	*
DX376	A. DuVernay text messages re NYC document release	2018-07-19	DEFS177564	DEFS177566	* FRE 402
DX377	Benjamin Mueller et al., "City Releases Trove of Documents in Central Park Jogger Case," <i>N.Y. Times</i>	2018-07-20	DEFS178194	DEFS178196	* FRE 402, FRE 802
DX378	A. DuVernay Text Message re Daily News article	2018-07-20	DEFS177570	DEFS177570	* FRE 402, FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX379	Rich Schapiro, "Cameraman who shot Central Park 5 interrogation videos speaks out for first time," <i>N.Y. Daily News</i>	2018-07-22	DEFS177978	DEFS177981	* FRE 402, FRE 403 FRE 802
DX380	Email from J. Rosenthal to A. Engel Re: linda f discussion	2018-08-04	DEFS169191	DEFS169192	**
DX381	WIP Campaign Creative Brief	2018-08-30	DEFS148097	DEFS148135	* FRE 402, FRE 403
DX382	Email from Jane Rosenthal to A. DuVernay, B. Welsh, A. Engel and N. Wolarksy re: Fairstein tweet	2018-11-27	DEFS146894	DEFS146895	**
DX383	Tweets between L. Fairstein and A. Locke	2018-11-27	PRH000497	PRH000497	**
DX384	Email chain between A. DuVernay and B. Welsh re Notes on Cut after 2nd viewing	2018-12-19	DEFS159819	DEFS159821	* FRE 402, FRE 403 FRE 802
DX385	Email from A. DuVernay to Cindy Holland re: CP5 - 101 cut notes	2018-12-27	DEFS148240	DEFS148240	**
DX386	Untitled Central Park 5 Creative Brief	2019-01	DEFS147929	DEFS147961	* FRE 402, FRE 403

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX387	Email from B. Welsh to A. DuVernay re: 101 v. 2 cut notes	2019-01-15	DEFS159921	DEFS159922	* FRE 106 – page is cut off on right side
DX388	Email from B. Welsh to A. Engel re: 101 & 102 thoughts	2019-01-28	DEFS169166	DEFS169171	* FRE 402
DX389	Email chain re: When They See Us - date announce asset	2019-02-15	DEFS148860	DEFS148863	**
DX390	Email chain re Fwd: Untitled Central Park Five - Timely PR Items	2019-02-16	DEFS158202	DEFS158207	* FRE 402, FRE 403
DX391	Email chain re CP5 - date announcement update	2019-02-18	DEFS158753	DEFS158754	* FRE 402, FRE 403, FRE 802
DX392	Email chain re: When They See Us - date/title announce	2019-02-19	DEFS157174	DEFS157174	**
DX393	Episode 4, Cut 1	2019-02-22	DEFS178138	DEFS178138	*

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX394	104 Cutv.1 - Netflix Notes 2.25.19	2019-02-25	DEFS145040	DEFS145042	**
DX395	When They See Us Communication Plan	Undated	DEFS169113	DEFS169117	**
DX396	When They See Us Twitter page	Undated	LF00051446	LF00051446	**
DX397	Draft Date Announce Press Release	Undated	DEFS144858	DEFS144860	**
DX398	Draft Felicity Huffman/When They See Us Communication Plan	Undated	DEFS145245	DEFS145246	* FRE 402
DX399	Teaser <i>When They See Us</i> Date Announce	2019-03-01			**
DX400	When They See Us Guidance	2019-04-10	DEFS075772	DEFS075773	*
DX401	When They See Us Social Campaign	2019-04-16	DEFS154905	DEFS154927	**
DX402	<i>When They See Us</i> Trailer	2019-04-19			*
DX403	Screenshot of When They See Us Landing Page	2019-05-17	DEFS168988	DEFS168988	*
DX404	Email from Tenicka Boyd to Marleisse Stephens, Rashid Shabazz re: When They Se Us: Fairstein Demonstration Tomorrow	2019-06-05	DEFS153640	DEFS153642	**
DX405	Email from Tenicka Boyd to Marleisse Stephens re: When They See Us/Social Launch Repot & Next Steps	2019-06-11	DEFS146916	DEFS146922	**

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX406	http://whentheyseeus.winningjustice.org/				FRE 402, FRE 403
DX407	Article entitled "Ava DuVernay shuts down Trump's Central Park Five comments: 'There's no truth to it'"	2019-06-18	LF00051016	LF00051022	*
DX408	Email chain between Attica Locke and Geoffrey Feldman	2019-07-02	DEFS176161	DEFS176162	*
DX409	Gay Jervy, <i>Prosecutor on the Sex Crimes Beat</i> , The American Lawyer	1986-05-01	LF00000702	LF00000712	* FRE 402, FRE 802
DX410	Eric Reynolds' Steno Pad	Undated	NYCLD_057937	NYCLD_057938	*
DX411	Eric Reynolds' Steno Pad	1989-04-19	NYCLD_057939	NYCLD_057945	*
DX412	Appearance Ticket	1989-04-20	NYCLD 8936		*
DX413	Appearance Ticket	1989-04-20	NYCLD 8937		*
DX414	Nugent Reporter's Notebook	1989-04-20	NYCLD_045080	NYCLD_045112	**
DX415	Linda Fairstein Handwritten notes	Undated	NYCLD_039187	NYCLD_039194	* FRE 402
DX416	Linda Fairstein Handwritten notes	Undated	NYCLD_039195	NYCLD_039206	* FRE 402
DX417	Handwritten Notes	1989-04-21	LF00029766	LF00029767	**

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX418	Compilation of Daily News articles April 21, 2019 - May 1, 1989	1989-04-21	DEFS178068	DEFS178086	* FRE 802
DX419	"No Bail for Park Supsects; Judge cites their statements, severity of crimes", Newsday	1989-04-24	DEFS178145	DEFS178147	* FRE 802
DX420	"The Jogger and the Wolf Pact," N.Y. Times	1989-04-26			* FRE 402, FRE 802
DX421	"Park Suspect: We Debated Whether to Kill the Jogger; Defense asks that tapes not be used," Newsday	1989-09-25	DEFS178148	DEFS178149	* FRE 402, FRE 802,
DX422	Timothy Clifford, "DNA Tests No Aid in Park Case; Crucial hearing kicks off on 7 suspects' statements," Newsday	1989-10-10	DEFS177985	DEFS177986	* FRE 402 FRE 802
DX423	Letter from FBI to E. Lederer	1989-11-13	NCYLD_039556	NCYLD_039556	* FRE 402, FRE 802
DX424	Letter from FBI to E. Lederer	1990-05-25	NYCLD_039559	NYCLD_039561	* FRE 402, FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX425	Letter from E. Lederer to M. Joseph	1990-06-05	NYCLD_000330	NYCLD_000330	*
DX426	Ronald Sullivan, "Detective Says He Tricked Jogger Suspect," N.Y. Times	1990-06-24			FRE 402, FRE 802
DX427	Lizette Alvarez, "DNA prints fail to ID jogger's attackers," N.Y. Daily News	1990-07-14	DEFS177990	DEFS177990	* FRE 402, FRE 802
DX428	Semen Tested in Jogger Case Was Not That of Defendants, 7-14-90.pdf	1990-07-14	DEFS178061	DEFS178062	* FRE 402, FRE 802
DX429	Victoria Balfour, "The Jogger D.A. Elizabeth Lederer and the case that shook New York," People Magazine	1991	LF00000973	LF00000977	**
DX430	Marie Brenner, "Erotomania," Vanity Fair	1991-09-01	LF0001001	LF00001016	* FRE 402
DX431	Ron Fournier, "Clinton Names Florida Prosecutor Attorney General," Associated Press	1993-02-11	DEFS178059	DEFS178060	* FRE 402, FRE 802
DX432	Karl Vick, "Reno, Clinton Talk, but no decision made," St. Petersburg Times	1993-02-11	DEFS178006	DEFS178007	* FRE 402, FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX433	Opinion in the <i>People of the State of New York v. Yusef Salaam</i> Appeal, 83 N.Y.2d 51 (1993)	1993-12-16			* FRE 402, FRE 403 FRE 802
DX434	Linda Fairstein, "Spring is the season to be most fearful," Daily News	1994-04-19	DEFS177277	DEFS177278	* FRE 402
DX435	Robert W. Snyder, "Virgins, Vamps and the Tabloid Mentality, A prosecutor contend that when rape makes new, the press offers titillation, not education, Interview with Linda Fairstein," Media Studies Journal	1998	LF00050801	LF00050803	* FRE 402
DX436	Ayo Onatade, "Interview with Linda Fairstein," Mystery Women	2002-04-01	LF00000804	LF00000813	* FRE 402
DX437	Letter from Linda Fairstein to Jim Kindler	2002-07-15	NYCLD_039818	NYCLD_039819	* FRE 402
DX438	Letter from L. Fairstein to R. Morgenthau	2002-09-27			* FRE 402

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX439	Michael Gross, "Not Ready for 'Primetime'?", N.Y. Daily News	2002-10-20	DEFS178035	DEFS178038	* FRE 802
DX440	"Key Prosecutor: No regrets in Central Park attack convictions," Associated Press	2002-11-24	DEFS177165	DEFS177165	* FRE 802
DX441	Dave Goldiner, "'Absolutely' Guilty Prosecutor has no regrets in jogger rape convictions," Daily News	2002-11-25	DEFS177970	DEFS177972	* FRE 802
DX442	Barbara Ross, "Ex Prosecutor Reopens Old Rift," N.Y. Daily News	2002-12-02	DEFS178172	DEFS178173	* FRE 802
DX443	Email from E. Lederer re A final thought	2002-12-04	NCYLD_036650	NCYLD_036650	*
DX444	Untitled email between L. Fairstein and E. Lederer	2002-12-10	EL 000314	EL 000314	*

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX445	Audio file of NPR story re filing of Ryan affirmation	2002-12	DEFS178139	DEFS178139	* FRE 802
DX446	Audio file of NPR story; transcript produced at DEFS178169	2002-12-06	DEFS178140	DEFS178140	* FRE 802
DX447	"New evidence in Central Park jogger rape case from 1989," NPR Morning Edition	2002-12-06	DEFS178169	DEFS178170	* FRE 802
DX448	Susan Edelman and Andrea Peyser, "Legal Eagles' Rivalry Behind Jogger Probe," The New York Post	2002-12-08	DEFS178008	DEFS178010	* FRE 802
DX449	Marcus Warren, "'People assume I hate men' Sex crimes prosecutor Linda Fairstein gave up the job to write novels - but there's one case that she can't let go," The Daily Telegraph (London)	2003-01-21	DEFS178020	DEFS178022	* FRE 802
DX450	Statement of Linda Fairstein Former Prosecutor in Charge of the Sex Crimes Unit Manhattan District Attorney's Office, Statement of the Public Safety Committee of the New York City Council	2003-01-30	LF00002726 NYCLD_039825	LF00002739 NYCLD_039838	*

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX451	Benjamin Smith, "The Practitioner," LEGAL AFFAIRS, Sept-Oct 2003.pdf	2003-09	DEFS177973	DEFS177977	* FRE 802
DX452	Jackie McGlone, "sex crime and the city; As a fearless prosecutor, she headed up the Central Park Jogger rape case; as a bestselling author she is the epitome of glamour. But Linda Fairstein has many ghosts to exorcise," The Herald (Glasgow)	2004-02-07	DEFS178000	DEFS178005	* FRE 802
DX453	Linley Boniface, "Crime and Publishing," <i>The Dominion Post</i>	2004-04-03	N/A		* FRE 802
DX454	Email from L. Fairstein re for the Boss	2004-05-16	NYCLD_039839	NYCLD_039839	*
DX455	Linda Fairstein, "My Lunch With Harvey," Vanity Fair	2007-03	DEFS178039	DEFS178044	* FRE 402, 403
DX456	XMAS KINO NEWS Talking Points	2007-07-06	LF00050806	LF00050808	*
DX457	Op. and Order on Mot. to Dismiss, <i>McCray, et al. v. City of N.Y., et al.</i> , No. 1:03-cv-9685, 2007 WL 4352748 (S.D.N.Y. Dec. 11, 2007)	2007-12-11			FRE 402, FRE 403 FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX458	City Defendants' Answer to Amended Complaint in <i>In re McCray, Richardson, Santana, Wise and Salaam Litigation</i>	2008-06-04			FRE 402, FRE 403 FRE 802
DX459	Letter from Linda Fairstein to Robert Morgenthau	2010-01-04	NYCLD_039803	NYCLD_039805	* FRE 402
DX460	Email chain with L. Fairstein re one more GOOD thing	2012-06-25	LF00000020	LF00000020	* FRE 402 FRE 802
DX461	Email chain with L. Fairstein re A request for you to consider	2012-11-28	LF00000032	LF00000032	**
DX462	Email from L. Fairstein re My dear friend - hello and	2012-11-30	LF00000033	LF00000033	* FRE 402, FRE 403
DX463	Email from L. Fairstein to Laura Rossi re: Facebook and Twitter comments	2012-12-10	LF00045290	LF00045291	* FRE 402
DX464	Email from L. Fairstein to E. Lederer; G. Nelson; E. Daitz re: trash talk from Twitter with attachment	2013-01-09	LF00050705	LF00050707	* FRE 402
DX465	Email chain re Interview about Burns Documentary	2013-03-04	LF00039890	LF00039892	* FRE 402, 403, FRE 802
DX466	Email from L. Fairstein re Burns Film	2013-04-16	LF00000062	LF00000062	*

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
					FRE 402
DX467	Testimony of Linda Fairstein <i>In re: McCray, Richardson, Santana, Wise and Salaam</i> , S.D.N.Y., Docket No. 03cv9685	2013-04-23	NYCLD_038869	NYCLD_039170	*
DX468	Testimony of Linda Fairstein <i>In re: McCray, Richardson, Santana, Wise and Salaam</i> , S.D.N.Y., Docket No. 03cv9685	2013-04-24	NYCLD_039211	NYCLD_039515	*
DX469	Email from Stephen Snowden to E. Lederer requesting comment re: petition to have her fired	2013-04-25	LEDERER00171	LEDERER00172	FRE 802
DX470	Testimony of Linda Fairstein <i>In re: McCray, Richardson, Santana, Wise and Salaam</i> , S.D.N.Y., Docket No. 03cv9685	2013-05-01	NYCLD_039562	NYCLD_039790	*
DX471	Email from L. Fairstein re: attorney team from Facebook	2013-12-02	LF00000067	LF00000068	* FRE 402, FRE 403 FRE 802
DX472	Email from L. Fairstein to re: Twitter stuff for your team to keep on file - removed and blocked all	2013-12-17	LF00000069	LF00000070	* FRE 402
DX473	Email chain fom L. Fairstein re Hoping to talk	2014-05-07	LF00045307	LF00045308	* FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX474	Email from L. Fairstein re just another short FYI	2014-06-24	LF00000075	LF00000075	* FRE 402
DX475	Email chain with L. Fairstein re: Nice piece!!!	2014-11-09	LF00000154	LF00000155	* FRE 402, FRE 802
DX476	Email chain with L. Fairstein re One more piece of show biz news	2015-09-21	LF00000598	LF00000599	* FRE 402, FRE 403, FRE 802
DX477	Email chain with L. Fairstein re Good morning	2015-09-21	LF00000600	LF00000600	* FRE 402, FRE 403, FRE 802
DX478	2005 Profile in Mystery Scene, "Novelist for the Prosecution"	2015-11-04	LF00000694	LF00000698	*
DX479	Email from E. Lederer re Hi, and Happy Thanksgiving	2015-11-25	LEDERER00300	LEDERER00300	* FRE 802 FRE 402, 403
DX480	Email chain with E. Lederer re Damien and more	2015-12-10	LEDERER00301	LEDERER00302	* FRE 802 FRE 402, 403

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX481	Email from L. Fairstein to L. Rossi re by the way	2016-01-22	LF00035669	LF00035669	*
DX482	Email chain re Sorry sorry sorry to disappoint you	2016-01-22	DA_000428	DA_000428	*
DX483	Email from L. Fairstein to L Rossi re: Facebook	2016-04-07	LF00030212	LF00030213	*
DX484	Correspondence with Jane Rosenthal	2016-05-06	DEFS064861	DEFS64868	**
DX485	Email chain from Linda Fairstein to Trisha Meili, cc: Elizabeth Lederer re Trisha Meili Contact Form	2016-05-11	LF00035671	LF00035671	*
DX486	Email chain from Linda Fairstein to Jane Rosenthal, cc; Berry Welsh and Nellie Norden re Your email to me	2016-05-12	LF00035675	LF00035675	**
DX487	Email from E. Lederer to L. Fairstein re: project	2016-05-15	LEDERER00716	LEDERER00717	* FRE 402, 403 FRE 802
DX488	Email chain from Linda Fairstein to Trisha Meili re Checking In	2016-05-17	LF00030216	LF00030218	* FRE 402
DX489	Email chain from Linda Fairstein to Jane Rosenthal, cc; Elizabeth Lederer, Ava DuVernay and Berry Welsh re Fm Jane Rosenthal	2016-06-07	LF00038346	LF00038348	**

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX490	Letter to Jane Rosenthal, Ava DuVernay and Tribeca Film from Skadden Arps	2016-06-09	DEFS061790	DEFS061797	**
DX491	Email from E. Lederer to L. Fairstein re Eric Reynolds	2016-07-24	LEDERER00738	LEDERER00738	FRE 402 FRE 802
DX492	Letter from Jonathan Segal to Robert Zimet	2016-07-25			**
DX493	Letter from Robert Zimet to Jonathan Segal	2016-07-28			**
DX494	Email chain from Linda Fairstein to John Leland re Reachout from New York Times reporter	2016-11-21	LF00035719	LF00035723	**
DX495	Email chain re: Reachout from New York Times reporter	2016-11-21	DA0000063	DA0000063	**
DX496	Email from Linda Fairstein to Robert Friedman and Mike Powers re SVU Confidential [sic] EDITED with attachment	2017-03-12	LF00001830	LF00001837	**
DX497	Email from L. Fairstein to E. Reynolds re: Ken Burns reviews of jazz	2017-05-26	LF00030251	LF00030254	* FRE 402, FRE 403 FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX498	Email chain from Linda Fairstein to Tim Clements and Elizabeth Lederer re Central park Five Limited Series From Ava DuVernay Greenlit at Netflix, Variety	2017-07-07	LF00035741	LF00035741	* FRE 402
DX499	Letter from Robert Zimet (Skadden, Arps) to David Hyman (General Counsel, Netflix) re Netflix' planned collaboration with Ava DuVernay, Tribeca Films and Jane Rosenthal and enclosing letter of 6/9/2016	2017-07-11	LF00038579	LF00038637	**
DX500	Video of CBS News, Lesley Stahl interview	2017-07-16	DEFS178197	DEFS178197	**
DX501	Email chain between L. Fairstein and L. Rossi re A Note from Nelson DeMille	2017-07-18	LF00001986	LF00001989	**
DX502	Email chain between L. Fairstein and E. Lederer re scrambling to get stuff done	2017-07-29	LF00039907	LF00039908	* FRE 402, FRE 403 FRE 802
DX503	Email chain with L. Fairstein re: Interview	2017-08-22	LF00050716	LF00050717	* FRE 402, FRE 403 FRE 802
DX504	Email chain with L. Fairstein re: "I haven't even"	2017-08-24	LF00002068	LF00002068	* FRE 402, FRE 403, FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX505	Email chain with L. Fairstein re: My apologies . . .	2017-08-27	LF00050583	LF00050583	* FRE 402, FRE 403 FRE 802
DX506	Email chain with L. Fairstein re: "BTW..."	2017-08-29	LF00002090	LF00002090	* FRE 402, FRE 403 FRE 802
DX507	Email chain between L. Fairstein, E. Lederer and E. Reynolds re Dr. Charles Hirsch	2017-08-30	LF00050585	LF00050585	* FRE 402, FRE 403 FRE 802
DX508	L. Fairstein text with B. G.	2017-09-11	LF00041523	LF00041523	* FRE 402, FRE 403, FRE 802
DX509	L. Fairstein text with B. G.	2017-09-12	LF00041525	LF00041525	* FRE 402, FRE 403 FRE 802
DX510	Email from B. G. to L. Fairstein re response from Weinstein Company	2017-09-29	LF00041527	LF00041527	* FRE 402, FRE 403 FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX511	Megan Twohey et al., "For Weinstein, A Brush With the Police, Then No Charges," N.Y. Times (Oct. 15, 2017)	2017-10-15	DEFS177775	DEFS177780	FRE 402, FRE 403 FRE 802
DX512	Bruce Golding, "Linda Fairstein vouched for Weinstein's lawyer in model-grope case: report," N.Y. Post (Oct. 15, 2017)	2017-10-15	DEFS177781	DEFS177790	FRE 402, FRE 403 FRE 802
DX513	Terry Gross, "'Times' Reporters Describe How A Paper Trail Helped Break The Weinstein Story," NPR (Nov. 15, 2017)	2017-11-15	DEFS177791	DEFS177798	FRE 402, FRE 403 FRE 802
DX514	Jenna Moratta, "'The King's Speech' and 'The Artist' Best Picture Oscars Currently Missing From the Weinstein Company's Offices — Report," IndieWire (Jan. 18, 2018)	2018-01-18	DEFS177799	DEFS177804	FRE 402, FRE 403 FRE 802
DX515	David K. Li, "NYPD reportedly hid Weinstein accuser from his cronies at the Manhattan DA," Pagesix.com (March 17, 2018)	2018-03-17	DEFS177805	DEFS177807	FRE 402, FRE 403 FRE 802
DX516	Kathy Dobie, "To Catch a Predator," NY Magazine (March 19, 2018)	2018-03-19	DEFS177808	DEFS177824	FRE 402, FRE 403 FRE 802
DX517	Email from L. Fairstein to T. Clements re: Daily News and CPJ website	2018-04-29	ALC Confidential 0161	ALC Confidential 0183	*

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX518	Email chain from L. Fairstein to E. Lederer re Opinion, 'I Want to Hate...' The New York Times	2018-06-15	LF00002377	LF00002380	* FRE 402, FRE 403, FRE 802
DX519	Email chain from L. Fairstein to E. Lederer re fuck them all	2018-06-27	LF00039915	LF00039915	*
DX520	Email chain from L. Fairstein re Central Park 5 again	2018-06-27	LF00045427	LF00045428	* FRE 402, FRE 403 FRE 802
DX521	Graham Rayman "Central Park Five prosecutor breaks silence, says it was mistake to vacate convictions and pay off accused teens," NY Daily News	2018-07-19			FRE 802
DX522	Email from L. Fairstein to L. Rossi re: NY Daily News article "Lead police officer on the Central Park 5 case looks back on savage crime that rocked the city	2018-07-19	LF00002422	LF00002427	* FRE 402, FRE 403 FRE 802
DX523	Email chain between L. Fairstein, E. Lederer and E. Reynolds re Eric . . . this is FABULOUS	2018-07-19	LF00002416	LF00002416	* FRE 402, FRE 403
DX524	Email from L. Fairstein to T. Clements re: 7/19/18 Daily News Article	2018-07-20	LF00002439	LF00002439	* FRE 402, FRE 403

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX525	Email chain with L. Fairstein re Thank you for the chance to talk briefly	2018-07-21	LF00041129	LF00041131	*
DX526	Email from L. Fairstein to E. Lederer re: Central Park 5 documents	2018-07-23	LF00035797	LF00035799	* FRE 402, FRE 403 FRE 802
DX527	Email from L. Fairstein to L. Rossi re: negative comments on FB, Twitter and Instagram	2018-07-25	LF00002460	LF00002461	* FRE 802
DX528	Email from Linda Fairstein to Elizabeth Lederer re Take your allies where and attaching, <i>Central Park Rapists: Trump Was Right</i>	2018-07-26	LF00002464	LF00002467	* FRE 402, FRE 403 FRE 802
DX529	Email chain from Linda Fairstein to Elizabeth Lederer re Idea...?	2018-07-30	LF00002470	LF00002471	* FRE 402 FRE 802
DX530	Email chain with L. Fairstein to E. Lederer re Coulter. The Central Park Jogger Case	2018-07-30	LF00030322	LF00030323	* FRE 402, FRE 403 FRE 802
DX531	Linda Fairstein, "In Defense of The Central Park 5 Prosecution," New York Law Journal	2018-07-31	DEFS177163	DEFS177164	**

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX532	Email from E. Lederer to "tbrennenasst" re: Prosecutor in the CPJ prosecution	2018-08-16	LEDERER01208	LEDERER01208	* FRE 402, FRE 403 FRE 802
DX533	Email chain with E. Lederer and L. Fairstein re: also	2018-08-27	LEDERER01218	LEDERER01219	* FRE 402, FRE 403 FRE 802
DX534	Email chain between E. Lederer and L. Fairstein re also	2018-08-27	LEDERER01220	LEDERER01221	* FRE 402, FRE 403 FRE 802
DX535	Letter from Linda Fairstein to Felicity Huffman	2018-09-06	LF00040727	LF00040732	**
DX536	Email chain re Thanks so much - Letter attached!	2018-09-11	LEDERER01225	LEDERER01227	* FRE 402, FRE 802
DX537	Email chain with L. Fairstein re: Inquiry from ABC news - Central Park Jogger case	2018-10-19	LF00035801	LF00035803	* FRE 402, 403 FRE 802
DX538	Email chain with L. Fairstein re Just catching up	2018-11-06	LF00035805	LF00035806	* FRE 402

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
					FRE 802
DX539	Attica Locke tweets re Mystery Writers of America	2018-11-27	LF00046408	LF00046408	**
DX540	Instagram Posts between L. Fairstein and A. Locke	2018-11-27	LF00045937	LF00045937	**
DX541	Email chain between L. Rossi and L. Fairstein re I can speak now or later tonight	2018-11-27	LF00030357	LF00030357	*
DX542	Email from L. Fairstein re I am simply torn apart	2018-11-27	LF00041145	LF00041145	**
DX543	Email chain with L. Fairstein re twitter comments	2018-11-28	LF00035861	LF00035861	* FRE 402, FRE 403 FRE 802
DX544	Email chain between L. Fairstein and E. Lederer re Call me when you can	2018-11-28	LEDERER01248	LEDERER01248	* FRE 402, FRE 403 FRE 802
DX545	Email chain with L. Fairstein re Edgar	2018-11-29	LF00048001	LF00048001	* FRE 402, FRE 403 FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX546	Email from Linda Fairstein to Laura Rossi and Jane Hitchcock re As Mike says...Grandmaster for a day!	2018-11-29	LF00049671	LF00049671	* FRE 402, FRE 403
DX547	Email from Margery Flax to Donna Andrews re: Contact from the website	2018-11-30	Mystery000925	Mystery000925	* FRE 402, FRE 403 FRE 802
DX548	Email from L. Fairstein forwarding email re Linda Fairstein	2018-12-03	LF00035883	LF00035884	**
DX549	Email chain with E. Lederer and L. Fairstein re: "I've left Elizabeth off this one"	2018-12-10	LEDERER01274	LEDERER01275	* FRE 403 FRE 802
DX550	Email chain re This just in - I am overwhelmed - please keep just among us for the time being	2018-12-17	LF00047806	LF00047809	* FRE 802
DX551	Attica Locke Tweets	2018-12-18	LF00046339	LF00046339	**
DX552	Rebecca Rosenberg, "Harvey Weinstein's criminal defense lawyer, Benjamin Brafman, to withdraw from case," Fox News (Jan. 17, 2019)	2019-01-17	DEFS177825	DEFS177832	* FRE 402 FRE 403 FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX553	Email chain from E. Reynolds to E. Lederer and L. Fairstein re A question for you both	2019-02-06	LF00041256	LF00041256	* FRE 402
DX554	Email from L. Fairstein re An overdue introduction	2019-02-07	LF00035983	LF00035983	**
DX555	Email from L. Fairstein to L. Rossi re: small nudge	2019-03-11	LF00030395	LF00030397	* FRE 402, FRE 403 FRE 802
DX556	Email chain with L. Fairstein re One more thought . . .	2019-03-13	LF00036015	LF00036015	* FRE 402, FRE 403 FRE 802
DX557	Email from L. Fairstein to L. Rossi re: This is being retweeted a lot	2019-04-22	LF00036205	LF00036206	* FRE 402, FRE 403 FRE 802
DX558	Email chain re Update!	2019-04-24	LF00036209	LF00036209	* FRE 402, FRE 403
DX559	Email chain between L. Rossi and K. McMillan re Edits to website	2019-04-26	LF00050465	LF00050465	* FRE 402, FRE 403 FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX560	Printout of www.centralpark5joggerattackers.com		N/A		* FRE 402, FRE 403
DX561	Email chain re 3 updates	2019-04-30	LF00036215	LF00036216	* FRE 402, FRE 403 FRE 802
DX562	Email from L. Fairstein to L. Fairstein re: CBS Sunday Morning	2019-05-12	LF00036233	LF00036234	* FRE 402, FRE 403 FRE 802
DX563	Email from L. Fairstein to L. Rossi Totten re: Tonight: NBC Nightly News - Lester Holt interview about Netflix series, May 13.	2019-05-13	LF00036243	LF00036244	* FRE 402, FRE 403 FRE 802
DX564	Email from L. Fairstein to T. Clements re: Lester Holt Interview about Netflix Series	2019-05-13	LF00036256	LF00036259	* FRE 402, FRE 403
DX565	Email from L. Fairstein re: LOOPING IN LINDA - Twitter account is gone - suspended	2019-05-14	LF00036290	LF00036291	* FRE 402, FRE 403 FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX566	Email chain between L. Fairstein and L. Rossi Re Other comments and blocked names - Twitter	2019-05-14	LF00036279	LF00036281	* FRE 402, FRE 403 FRE 802
DX567	Email chain re Draft Letter to Editor	2019-05-20	LEDERER01437	LEDERER01440	* FRE 402, FRE 403 FRE 802
DX568	Email chain re Promoting the website	2019-05-20	LEDERER01385	LEDERER01387	* FRE 402, FRE 403 FRE 802
DX569	Email from E. Lederer re: Draft Letter to Editor	2019-05-30	LF00041269	LF00041272	* FRE 402, FRE 403 FRE 802
DX570	Email chain re: NPR Inquiry for Linda Fairstein	2019-05-30	LF00036348	LF00036350	*
DX571	Email chain from Linda Fairstein to Richard Plansky re Central Park Five - Safe Horizon Blog Post	2019-05-31	LF00036395	LF00036398	* FRE 402, FRE 403 FRE 802
DX572	Social Media Twitter May 31 2019	2019-05-31	LF00038059	LF00038060	*

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX573	Twitter Document #2		LF00038120	LF00038141	*
DX574	Twitter Memo #3 Linda Fairstein Account		LF00038081	LF00038119	*
DX575	Email chain from L. Fairstein re As you may have seen	2019-06-04	LF00040176	LF00040176	*
DX576	Email chain with L. Fairstein re Press Inquiry from Glamour	2019-06-04	LF00036500	LF00036501	* FRE 402, FRE 403 FRE 802
DX577	Email chain from L. Fairstein re Trying to help	2019-06-05	LF00036528	LF00036529	*
DX578	Email chain with L. Fairstein re God's Love Board Update	2019-06-05	LF00041321	LF00041322	*
DX579	Letter from Christine Ball (Dutton) to Linda Fairstein terminating 2019 Agreement	2019-06-07	LF00040932	LF00040933	**
DX580	Email chain re Agreement	2019-06-07	LF00040928	LF00040930	* FRE 402
DX581	Email chain between L. Rossi and L. Fairstein re Dear dear Laura . . .	2019-06-07	LF00040888	LF00040888	**
DX582	Color of Change Petition	2019-06-07	LF00038477	LF00038480	*

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX583	Email from L. Fairstein re I am so sorry to have	2019-06-09	LF00036581	LF00036581	* FRE 402, FRE 403 FRE 802
DX584	Letter from L. Fairstein re Op-Ed	2019-06-09	LF00040197	LF00040197	* FRE 106 This appears to be one attachment to an email located at LF00040189-40197
DX585	Linda Fairstein, "Netflix's False Story of the Central Park Five," Wall Street Journal	2019-06-10	DEFS177264	DEFS177267	**
DX586	Email re This is the longer version of what I cropped for OpEd	2019-06-11	LF00036745	LF00036750	*
DX587	Email chain between L. Fairstein and L. Rossi re Article	2019-06-12	LF00040395	LF00040395	* FRE 402, FRE 403 FRE 802
DX588	Email chain between L. Fairstein and E. Reynolds Re: Dramatic License: Is Fairstein Fair Game Simply Justice	2019-06-12	LF00036759	LF00036759	* FRE 402, FRE 403 FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX589	Email chain from L. Fairstein re Smerconish show	2019-06-15	LF00045612	LF00045613	*
DX590	Eric Reynolds interview with Michael Smerconish	2019-06-15	LF00050690	LF00050690	*
DX591	Email from L. Fairstein to E. Reynolds re: smerconish	2019-06-17	LF00036839	LF00036845	*
DX592	Email chain with L. Fairstein re Hi from Law&Crime	2019-06-19	LF00040235	LF00040237	* FRE 402, FRE 403 FRE 802
DX593	Email from L. Fairstein to L. Rossi re: "Tweets-numbers are very very low!!!"	2019-06-20	LF00040397	LF00040397	*
DX594	Email chain between L. Fairstein and L. Rossi re Good morning from the Vineyard	2019-06-24	LF00047701	LF00047701	* FRE 402, FRE 403
DX595	Email chain between L. Fairstein and L. Rossi re Kindle	2019-07-09	LF00040436	LF00040436	* FRE 402, FRE 403
DX596	Email from E. Lederer to L. Fairstein re will you please skim this for comments? I did it today?	2019-07-14	LF00040514	LF00040514	* FRE 402, FRE 403 FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX597	Email from L. Rossi to L. Fairstein re: CP5 website stats	2019-07-18	LF00040632	LF00040633	* FRE 402, FRE 403 FRE 802
DX598	Email from L. Fairstein to E. Reynolds re: Tamron Hall CPJ Interview	2019-07-18	LF00036947	LF00036949	*
DX599	Email chain between L. Fairstein and E. Lederer re Ava did a very good job in her pitch to me and	2019-07-19	LF00040267	LF00040267	*
DX600	Email from Fairstein to Lederer re: ADV conversation	2019-08-07	LF00040297	LF00040298	*
DX601	Email chain from L. Fairstein to L. Rossi re Finding a lot online and stumbled on this	2019-08-29	LF00040396	LF00040396	* FRE 402, FRE 403
DX602	Email chain re Our dinner with a Rosenwald!	2019-09-09	LF00030473	LF00030474	* FRE 402, FRE 403 FRE 802
DX603	Megan Garber, "The Plan to Make Harvey Weinstein a Hero," The Atlantic (Sept. 9, 2019)	2019-09-09	DEFS177848	DEFS177853	* FRE 402, FRE 403 FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX604	Gene Maddaus, "How 13 Weinstein Scandal Figures Come Out in Jodi Kantor and Megan Twohey's New Book 'She Said,'" Variety (Sept. 10, 2019)	2019-09-10	DEFS177854	DEFS177866	* FRE 402, FRE 403 FRE 802
DX605	Rose Minutaglio "New York Times Reporters Jodi Kantor And Megan Twohey On Harvey Weinstein, #MeToo And Lisa Bloom," Elle (Sept. 10, 2019)	2019-09-10	DEFS177867	DEFS177883	* FRE 402, FRE 403 FRE 802
DX606	Adrienne Westenfeld, "Jodi Kantor and Megan Twohey Outline the Crucial Details That Broke Open Their Explosive Weinstein Investigation," Esquire (Sept. 11, 2019)	2019-09-11	DEFS177884	DEFS177898	* FRE 402, FRE 403 FRE 802
DX607	Adrian Horton, "She Said: an inside look at the story that brought down Harvey Weinstein," The Guardian (Sept. 11, 2019)	2019-09-11	DEFS177899	DEFS177906	* FRE 402, FRE 403 FRE 802
DX608	Email chain from L. Fairstein to E. Lederer re So this is weird - I had in my head	2019-11-18	LF00036994	LF00036994	*
DX609	Suzy Evans, "Jodi Kantor and Megan Twohey Detail How Weinstein Investigation Led to 'She Said,'" The Hollywood Reporter (Sept. 26, 2019)	2019-11-26	DEFS177910	DEFS177923	* FRE 402, FRE 403 FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX610	Irin Carmon, "100 Women vs. Harvey Weinstein," The Cut (Jan. 6, 2020)	2020-01-06	DEFS177924	DEFS177933	* FRE 402, FRE 403 FRE 802
DX611	Shan Wu, "Why White-Collar Sex Creeps Keep Getting VIP Treatment From Manhattan Prosecutors," The Daily Beast	2020-01-18	DEFS177934	DEFS177936	* FRE 402, FRE 403 FRE 802
DX612	Email chain from L. Fairstein re And then there is this	2020-03-22	LF00040355	LF00040357	* FRE 802
DX613	Rachel Sharp, "Central Park five prosecutor Linda Fairstein is intervening in criminal cases on behalf of her Martha's Vineyard friends and offering her former DA office colleagues positive press coverage, emails reveal," Daily Mail	2021-05-06	DEFS177937	DEFS177948	* FRE 402, FRE 403 FRE 802
DX614	Molly Redden, "Emails Show Famed Prosecutor Linda Fairstein Intervening In Criminal Cases For NYC's Elite," Huffington Post	2021-05-06	DEFS177949	DEFS177969	* FRE 402, FRE 403 FRE 802
DX615	Constance Grady, "Who deserves a book deal?," Vox	2021-05-17	LF00051162	LF00051171	* FRE 402, FRE 403 FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX616	Email to L. Fairstein re Our Letter to the MWA	2021-09-21	LF00005968	LF00005971	**
DX617	Plaintiff's Objections and Responses to Defendant Netflix's Amended First Set of Interrogatories	2021-12-14	N/A		*
DX618	Plaintiff's Amended Responses and Objections to Interrogatory No. 2	2022-02-25			*
DX619	Plaintiff's Responses and Objections to Netflix's Second Set of Interrogatories	2022-06-13			*
DX620	Plaintiff's Amended Responses and Objections to Interrogatory No. 13	2022-06-29			*
DX621	Plaintiff Linda Fairstein's Response to Defendants' Statement of Undisputed Material Facts	2022-11-30			* FRE 403, FRE 802
DX622	Sexual Violence: Our War Against Rape		DEFS178098		* FRE 402
DX623	Final Jeopardy		DEFS178099		* FRE 402
DX624	Likely To Die		DEFS178100		* FRE 402

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX625	Cold Hit		DEFS178101		* FRE 402
DX626	The Dead-House		DEFS178102		* FRE 402
DX627	The Bone Vault		DEFS178103		* FRE 402
DX628	The Kills		DEFS178104		* FRE 402
DX629	Entombed		DEFS178105		* FRE 402
DX630	Death Dance		DEFS178106		* FRE 402
DX631	Bad Blood		DEFS178107		* FRE 402
DX632	Killer Heat		DEFS178108		* FRE 402
DX633	Lethal Legacy		DEFS178109		* FRE 402

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX634	Hell Gate		DEFS178110		* FRE 402
DX635	Silent Mercy		DEFS178111		* FRE 402
DX636	Night Watch		DEFS178112		* FRE 402
DX637	Death Angel		DEFS178113		* FRE 402
DX638	Terminal City		DEFS178114		* FRE 402
DX639	Devil's Bridge		DEFS178115		* FRE 402
DX640	Surfing the Panther (co-authored)		DEFS178116		* FRE 402
DX641	Killer Look		DEFS178117		* FRE 402
DX642	Deadfall		DEFS178118		*

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
					FRE 402
DX643	Blood Oath		DEFS178119		* FRE 402
DX644	Into the Lion's Den		DEFS178120		* FRE 402
DX645	Digging for Trouble		DEFS178121		* FRE 402
DX646	Secrets from the Deep		DEFS178122		* FRE 402
DX647	From the Files of Linda Fairstein—Killer Charm: The Double Lives of Psychopaths		DEFS178123		* FRE 402
DX648	From the Files of Linda Fairstein—How Serial Rapists Target Their Victims		DEFS178124		* FRE 402
DX649	From the Files of Linda Fairstein—The Rape Scandal That Puts You At Risk		DEFS178125		* FRE 402
DX650	From the Files of Linda Fairstein—The Five Most Dangerous Places for Women		DEFS178126		* FRE 402

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX651	From the Files of Linda Fairstein—The Most Surprising Crime Zone: Your Own Home		DEFS178127		* FRE 402
DX652	From the Files of Linda Fairstein—Why Some Women Lie About Rape		DEFS178128		* FRE 402
DX653	From the Files of Linda Fairstein—Killer Charm: And Other True Cases		DEFS178129		* FRE 402
DX654	Ava DuVernay Twitter Profile (1 of 2)		LF00056295	LF00058269	*
DX655	Ava DuVernay Twitter Profile (2 of 2)		LF00058270	LF00060244	*
DX656	Ava DuVernay Twitter Posts	2022-03	LF00055005	LF00055164	*
DX657	Attica Locke Instagram Posts	2022-03	LF00064190	LF00064196	*
DX658	Attica Locke Twitter Profile (1 of 2)		LF00064614	LF00066469	*
DX659	Attica Locke Twitter Profile (1 of 2)		LF00066470	LF00068325	*
DX660	Attica Locke Twitter Posts	2022-03	LF00069123	LF00069185	*
DX661	When They See Us Twitter Posts		LF00051669	LF00053934	*
DX662	Email chain with C. Ball re FW: Central Park	2013-03-12	PRH000399	PRH000400	* FRE 402, FRE 403 FRE 802
DX663	Fairstein's historical sales	2019	PRH000061	PRH000061	*

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX664	Email chain re Fwd: We might need to take down my Instagram account, too	2019-06-02	PRH000101	PRH000102	**
DX665	Email chain to C. Ball re Linda Fairstein - calls for boycott and Netflix reaction	2019-06-03	PRH000109	PRH000112	**
DX666	Email chain to C. Ball re Fairstein Statement	2019-06-03	PRH000113	PRH000114	**
DX667	Email chain re URGENT for CNN	2019-06-04	PRH000127	PRH000129	**
DX668	Email chain re Linda Fairstein update/end of day	2019-06-04	PRH000135	PRH000137	**
DX669	Email chain from C. Ball re Linda Fairstein/potential customer service complaints	2019-06-06	PRH000169	PRH000173	**
DX670	Email chain to E. Newberg re 9:00	2019-06-06	PRH000178	PRH000179	*
DX671	Email chain re Linda Fairstein	2019-06-07	PRH000187	PRH000187	*
DX672	Email from C. Ball to E. Newberg re Agreement	2019-06-07	PRH000198	PRH000200	**
DX673	Email chain re Linda Fairstein	2019-06-26	PRH000220	PRH000220	**

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX674	Email to info@glwd.org re Linda Fairstein	2019-06-04	GLWD 0256	GLWD 0256	* FRE 802
DX675	Email FWD re Direct Message on Twitter	2019-06-04	GLWD 0346	GLWD 0347	* FRE 802
DX676	Email from L. Fairstein re will this work? xx (with attachment)	2019-06-04	GLWD 0365	GLWD 0366	**
DX677	Email chain with L. Fairstein re will this work? xx	2019-06-04	GLWD 0994	GLWD 0995	**
DX678	Email chain with L. Fairstein re did you also resign from	2019-06-04	LF00036514	LF00036515	* FRE 402
DX679	Email chain with L. Fairstein re FOX 5 NEWS REPORTER	2019-06-04	LF00041319	LF00041320	*
DX680	Vassar email with attachment re New tweet	2019-06-02	VC00000061	VC00000062	FRE 802
DX681	Vassar email chain re An Issue	2019-06-03	VC00000094	VC00000096	*

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX682	Vassar email chain re I hope the truth is	2019-06-03	VC00000164	VC00000165	*
DX683	Vassar email chain re Linda Fairstein - Board of Trustees	2019-06-03	VC00000208	VC00000208	* FRE 802
DX684	Vassar email chain re 800 number complaints	2019-06-03	VC00000219	VC00000219	* FRE 802
DX685	Vassar email chain re Linda Fairstein must step down	2019-06-03	VC00000263	VC00000264	* FRE 802 FRE 403
DX686	Email from E. Bradley re Statement to the Community	2019-06-04	VC00000401	VC00000401	*
DX687	Email to Vassar Board re Announcement with attachment	2019-06-04	VC00000403	VC00000405	*
DX688	Vassar email chain re Update	2019-06-04	VC00000480	VC00000482	* FRE 802
DX689	Email from E. Bradley re This is not helping us	2019-06-19	VC00002973	VC00002973	* FRE 802 FRE 403

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX690	Email from E. Bradley re Here are my notes with attachment	2019-06-28	VC00003266	VC00003270	* FRE 402, FRE 403 FRE 802
DX691	Email from E. Bradley re Linda Fairstein summary	2019-07-10	VC00003552	VC00003552	**
DX692	Email chain with L. Fairstein re I hope your summer is going well	2019-07-17	VC00003703	VC00003707	* FRE 402, FRE 403 FRE 802
DX693	Chart of Fairstein's advances				* FRE 403, FRE 802
DX694	Email chain between L. Fairstein and E. Newberg re having our numbers person do the math to see in fact what they are losing	2019-03-18	LF00036024	LF00036024	**
DX695	Email to E. Newberg re Linda Fairstein	2019-06-11	ICM-00000190_01	ICM-00000190_01	* FRE 402, FRE 403 FRE 802
DX696	Email from L. Fairstein to E. Newberg re my numbers are	2017-05-19	LF00001860	LF00001860	* FRE 402, FRE 403

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX697	Email from L. Fairstein to C. Ball and E. Newberg	2019-06-03	ICM-00000121_01	ICM-00000121_01	* FRE 402, FRE 403 FRE 802
DX698	Email from L. Fairstein re Request to Speak with PR Reps	2019-05-03	LF00036224	LF00036226	*
DX699	Safe Horizon email chain re Linda Fairstein Edgar Award Update	2018-12-03	SH 000016	SH 000019	* FRE 802
DX700	Safe Horizon email chain Summary of Yesterday's Conversations	2018-12-04	SH 000013	SH 000015	*
DX701	Email from A. Zwang re Notes from conversation about Linda with Steve and Mike	2018-12-05	SH 000010	SH 000012	* FRE 802
DX702	Safe Horizon email chain re More on Central Park Five - New Trailer - Next Steps with Linda?	2019-04-22	SH 000004	SH 000009	* FRE 802
DX703	Safe Horizon email chain re Vassar Board to review Linda Fairstein	2019-06-03	SH 000003	SH 000003	* FRE 802

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DX704	MWA email chain re Tweet by Linda Fairstein on Twitter	2018-11-27	Mystery000132	Mystery000133	* FRE 802
DX705	Email from D. Andrews re An Update on the Fairstein situation	2018-12-18	Mystery000155	Mystery000156	* FRE 402, FRE 403 FRE 802
DX706	MWA email chain re On the Fairstein Issue	2018-11-27	Mystery000207	Mystery000208	* FRE 802
DX707	MWA email chain re We have a problem	2018-11-27	Mystery000349	Mystery000350	* FRE 802
DX708	MWA email chain re Possible courses of action	2018-11-28	Mystery000848	Mystery000851	* FRE 802
DX709	MWA email chain re Possible courses of action	2018-11-28	Mystery000889	Mystery000890	* FRE 802
DX710	MWA email chain re Query from Publishers Lunch: Criticism to Fairstein withdrawal	2018-12-18	Mystery001456	Mystery001458	* FRE 802

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DX711	August 13, 2012 Publishing Agreement - Dutton	2012-08-13	LF00029514	LF00029529	**
DX712	August 26, 2015 Publishing Agreement - Dutton/Penguin	2015-08-26	LF00029569	LF00029584	**
DX713	October 30, 2017 Publishing Agreement -Dutton/Penguin	2017-10-30	LF00029853	LF00029870	**
DX714	Penguin Random House Agreement with Fairstein Enterprises, LLC for two untitled works	2019-06-04	LF00005575	LF00005593	**
DX715	June 7, 2019 letter agreement between Penguin/Dutton and L. Fairstein, Untitled Alex Cooper #22, #23 and Graveyard	2019-06-07	LF00005568	LF00005569	**
DX716	June 26, 2019 letter agreement regarding reversion of rights to L. Fairstein	2019-06-26	LF00005573	LF00005574	**
DX717	September 23, 2019 agreement between L. Fairstein and Gere Donovan Press	2019-09-23	LF00041894	LF00041895	**
DX718	Gere Tactical Royalty Report January 2019-September 2021		LF00029992	LF00029992	**
DX719	New York City Council - Council Members and Districts https://council.nyc.gov/districts/				FRE 403, FRE 403 FRE 802
DX720	New York City Council - Yusef Salaam https://council.nyc.gov/district-9/				FRE 403, FRE 403 FRE 802

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DX721	Central Park Conservatory - Gate of the Exonerated https://www.centralparknyc.org/locations/gate-of-the-exonerated				FRE 402, FRE 403 FRE 802
DX722	The New York State Senate, "New 'Central Park Five' Law Requires Cops to Videotape Juvenile Interrogations" https://www.nysenate.gov/newsroom/in-the-news/2020/velmanette-montgomery/new-central-park-five-law-requires-cops-videotape-0#:~:text=NEW%20CENTRAL%20PARK%20FIVE'%20LAW%20REQUIRES%20COPS%20TO%20VIDEOTAPE%20JUVENILE%20INTERROGATIONS,-Rose%20Adams&text=A%20new%20law%20put%20forward,Andrew%20Cuomo%20signed%20on%20Nov.	2020-12-13			FRE 402, FRE 403 FRE 802
DX723	Rose Adams, "New 'Central Park Five' Law Requires Cops to Videotape Juvenile Interrogations," Brooklyn Paper https://www.brooklynpaper.com/central-park-five-juvenile-interrogations/				FRE 402, FRE 403 FRE 802
DX724	N.R. Kleinfield, "A CRIME REVISITED: VOICES; City Reminded of Fears It Believed It Left Behind"	2002-12-06	DEFS004218	DEFS004224	* FRE 402, FRE 403 FRE 802

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX725	Ronald Sullivan, "Defendant's Mother Ejected For Outburst at Jogger Trial," N.Y. Times	1990-08-07	DEFS004497	DEFS004498	* FRE 402, FRE 403 FRE 802
DX726	Sean Piccoli and Michael Gold, "After Furor, Literary Group Withdraws Honor for 'Central Park Five' Prosecutor," N.Y. Times	2018-11-28	DEFS177132	DEFS177133	*
DX727	Katherine Bouton, "Linda Fairstein vs. Rape," N.Y. Times	1990-02-25	DEFS177217	DEFS177224	*
DX728	Emily Sachar, "Mother's Outburst at Jogger Trial: Proclaims son's innocence on final day of testimony," Newsday	1990-08-07	DEFS177227	DEFS177228	* FRE 402, FRE 403 FRE 802
DX729	Jim Dwyer and Kevin Flynn, "New Light on Jogger's Rape Calls Evidence Into Question – Correction Appended," N.Y. Times	2002-12-01	DEFS177268	DEFS177276	* FRE 802
DX730	Rivka Gewirtz Little, "Ash-Blond Ambition," The Village Voice	2002-11-19	DEFS177300	DEFS177303	* FRE 802
DX731	Jane Fritsch and Katherine E. Finkelstein, "Charges Dismissed in Columbia Sexual Torture Case," N.Y. Times	2001-11-02	DEFS177982	DEFS177984	* FRE 402, FRE 403 FRE 802

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DX732	Fred Kaplan, "Another Day in Court for 1989 Case That Summed Up New Yorkers' Fears," Boston Globe	2002-12-04	DEFS177994	DEFS177996	* FRE 402, FRE 403 FRE 802
DX733	Karen Freifeld, "Prosecutor Rebuts Police Jogger Report: Tells City Council evidence points to Reyes," Newsday	2003-01-31	DEFS178057	DEFS178058	* FRE 402, FRE 403 FRE 802
DX734	Ronald Sullivan, "Father Defends His Son At Central Park Trial," N.Y. Times	1990-08-03	DEFS004469	DEFS004470	* FRE 402, FRE 403 FRE 802
DX735	Barbara Ross and Robert Ingrassia, "JOY AND RAGE OVER JOGGER 5 Morgy's decision clears them of all charges," N.Y. Daily News Article	2002-12-06	DEFS004295	DEFS004298	* FRE 402, FRE 403 FRE 802
DX736	Monica Hesse, "The slippery moral calculus of Linda Fairstein," The Washington Post	2019-06-05	LF00051100	LF00051103	*
DX737	Bruce Golding, "Fairstein Smear Rap," N.Y. Post	2010-03-26	hyperlinked to Freinberg report		FRE 802
DX738	Frankie Edozien, "'Cyberfiend' Rips Prosecutor Says She Wielded Poi\$on Pen," N.Y Post	2000-01-10	hyperlinked to Freinberg report		FRE 802

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DX739	Steve Dunleavy, "Prosecutors Should Resign in Shame," N.Y. Post	2001-11-02	hyperlinked to Freinberg report		FRE 802
DX740	Stuart Jeffries, "The Rapist Hunter," The Guardian (UK)	2004-02-27	hyperlinked to Freinberg report		FRE 802
DX741	Joan Didion, "New York: Sentimental Journeys," New York Review	1991-01-17	hyperlinked to Freinberg report		FRE 802
DX742	"Fairstein Booed at Signing," N.Y. Post	2011-03-13	hyperlinked to Freinberg report		FRE 802
DX743	David Bianculli, "'Central Park Five': Rape, Race and Blame Explored," National Public Radio	2013-04-16	hyperlinked to Freinberg report		FRE 802
DX744	J.R. Jones, "The Thin Blue Lie in the Central Park Five," Chicago Reader	2012-12-05	hyperlinked to Freinberg report		FRE 802
DX745	Eisa Nefertari Ulen, "The Central Park Five: Exploring Race, Rape and Redemption," Washington Post	2013-04-16	hyperlinked to Freinberg report		FRE 802
DX746	Carol Memmott, "Ken Burns Brings 'Central Park Five' to Light," USA Today	2013-04-15	hyperlinked to Freinberg report		FRE 802
DX747	Cole Smithey, "The Central Park Five – New York Film Festival 2012," Smart New Media	2012-11-21	hyperlinked to Freinberg report		FRE 802
DX748	Steven Zeitchik, "A Voice at Last for 'Central Park Five'," Los Angeles Times	2012-11-28	hyperlinked to Freinberg report		FRE 802

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DX749	Steph Cha, "Writer Linda Fairstein's Past as a Prosecutor Overseeing the Central Park Five Case Causes Award Controversy," Los Angeles Times Article	2018-11-27	hyperlinked to Freinberg report		FRE 802
DX750	Lloyd Grove, "Central Park Five Prosecutor Takes Fire Over Ava DuVernay Netflix Series, Calls It 'Basket of Lies,'" Daily Beast Article	2019-06-04	hyperlinked to Freinberg report		FRE 802
DX751	Helen Ray, "Read Linda Fairstein and Trisha Meili's Full Statements on the Netflix Series 'When They See Us'," Today	2019-05-22	hyperlinked to Freinberg report		FRE 802
DX752	Chris Riemenschneider, "Actor Hugh Grant 'Fesses Up to Leno on 'Tonight Show'," Los Angeles Times	1995-07-11	hyperlinked to Freinberg report		FRE 802
DX753	Stephanie Soteriou, "People Are Angry that the Music Industry Seemingly Hasn't Learned Anything after Beyoncé and Lizzo Were Called Out for Using the Same Ableist Slur Just Weeks Apart," BuzzFeed News	2022-08-02	hyperlinked to Freinberg report		FRE 402, FRE 403 FRE 802
DX754	Ryan Young, "Offensive Tweets from Josh Allen Surface Hours Before NFL Draft," Yahoo! Sports	2018-04-25	hyperlinked to Freinberg report		FRE 402, FRE 403 FRE 802
DX755	"Josh Allen Apologizes after Offensive Tweets from High School Resurface," ESPN	2018-04-26	hyperlinked to Freinberg report		FRE 402, FRE 403 FRE 802

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DX756	Zlati Meyer, "Papa John's CEO, Pizza Titan John Schnatter, Steps Down," USA Today	2017-12-21	hyperlinked to Freinberg report		FRE 402, FRE 403 FRE 802
DX757	Sarah Whitten and Yen Nee Lee, "Papa John's Founder John Schnatter Resigns as Chairman after Apologizing for N-Word Comment, Shares Surge," CNBC Article	2018-07-12	hyperlinked to Freinberg report		FRE 402, FRE 403 FRE 802
DX758	Devin Leonard, "Papa John Is Still Obsessed With Papa John's," Bloomberg	2021-11-03	hyperlinked to Freinberg report		FRE 402, FRE 403 FRE 802
DX759	Ron Blitzer, "Paper John's John Schnatter Says Company Has Lost Its Way After Abandoning 'Conservative Values,'" Fox Business	2022-08-08	hyperlinked to Freinberg report		FRE 402, FRE 403 FRE 802
DX760	Ashlie D. Stevens, "Disgraced Pizza Mogul 'Papa John' Schnatter To Speak At CPAC," Salon	2022-02-17	hyperlinked to Freinberg report		FRE 402, FRE 403 FRE 802
DX761	Sandro Cohen "Oliver Jovanovic: First Sacrifice of the Digital Age," La Jornada, Available in English at: http://www.anusha.com/sandro.htm	1998-05-19	hyperlinked to Freinberg report		FRE 402, FRE 403 FRE 802
DX762	Steve Dunleavy, "Cybersex Victim's Kin: She's A Liar – Say She Falsely Accused Dad, Uncle of Sex Abuse," N.Y. Post	1999-07-26	hyperlinked to Freinberg report		FRE 402, FRE 403 FRE 802

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DX763	Dorothy Rabinowitz, "The Doctor's Story," Wall Street Journal	2000-05-24	hyperlinked to Freinberg report		FRE 402, FRE 403 FRE 802
DX764	Ian Mohr, "Mystery Writers of America Withdraw Former NYC Prosecutor's Honorary Award," Page Six	2018-11-29	hyperlinked to Freinberg report		*
DX765	Jennifer Peltz and Hillel Italie, "Mystery Writers Rescind Honor for Linda Fairstein, Prosecutor on 'Central Park Five' Case," USA Today	2018-11-29	hyperlinked to Freinberg report		*
DX766	"Linda Fairstein: Literary Group Rescinds Honor Over Role in Central Park Five Case," The Guardian (US)	2018-11-29	hyperlinked to Freinberg report		*
DX767	Mystery Writers of America Statement "Mystery Writers of America Withdraws Fairstein Award"	2018-11-29	hyperlinked to Freinberg and Kaplan reports		*
DX768	Email chain from L. Fairstein to E. Canders, et al. re Thanks once more for getting me through this week	2018-11-30	ICM-00000100	ICM-00000100	*
DX769	Email chain from L. Fairstein to E. Newberg, et al. re This just in - I am overwhelmed - please keep just among us for the time being.	2018-12-17	ICM-00000126	ICM-00000126	*
DX770	Penguin Random House Royalty Summary Statement for 3 titles (period 12/1/2018 to 5/31/2019)	2019-08-29	LF00032758	LF00032768	**

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DX771	Penguin Random House Royalty Summary Statement for 2 titles (period 1/1/2019 to 6/30/2019)	2019-10-28	LF00032769	LF00032779	**
DX772	Penguin Random House Royalty Summary Statement for Blood Oath (period 2/1/2019 to 7/31/2019)	2019-11-28	LF00032780	LF00032787	**
DX773	Penguin Random House Royalty Summary Statement for 3 titles (period 2/1/2019 to 7/31/2019)	2019-10-29	LF00032788	LF00032801	**
DX774	Penguin Random House Royalty Summary Statement for 2 titles (period 2/1/2019 to 7/31/2019)	2019-11-28	LF00032802	LF00032815	**
DX775	Email chain with L. Fairstein re Dutton Payment	2019-06-19	LF00036862	LF00036863	**
DX776	Email chain from Roz Lippel to L. Fairstein and Nan Graham re Linda Fairstein	2019-08-02	LF00039355	LF00039356	**
DX777	Meagan Flynn, "Mystery Writers group rescinds award from sex crimes prosecutor over her role in Central Park Five case," The Washington Post	2018-11-30	LF00051085	LF00051093	* FRE 802
DX778	"Publishing Companies Approved to Date by Membership Committee," Mystery Writers of America, Revised January 13, 2022, https://mysterywriters.org/how-to-	2022-01-13	hyperlinked to Kaplan report		

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	become-a-member-of-mwa/approved-publisher-list/.				
DX779	Alexandra Alter, and Rachel Adams, "Phillip Roth Biography Finds New Publisher," N.Y. Times	2022-05-18	hyperlinked to Kaplan report		
DX780	Elizabeth Arias and Jiaquan Xu, "United States Life Tables, 2019," National Vital Statistics Report, Vol. 70, No. 19, March 22, 2022	2022-03-22	KAPLAN000001	KAPLAN000059	*
DX781	Maureen Corrigan, "Does Linda Fairstein deserve a literary honor? Critics say her past as a prosecutor sullies her art," The Washington Post	2019-04-23	hyperlinked to Kaplan report		FRE 802
DX782	Tom Corson-Knowles, "List of Mystery and Thriller Writers," TCK Publishing	2018-12-06	hyperlinked to Kaplan report		
DX783	Gregory Cowles, "Inside the List," N.Y. Times	2015-03-06	hyperlinked to Kaplan report		
DX784	Gary Skoog, James E. Ciecka, and Kurt V. Krueger, "The Markov Model of Labor Force Activity 2012-17: Extended Tables of Central Tendency, Shape, Percentile Points, and Bootstrap Standard Errors," Journal of Forensic Economics 28(1-2), 2019	2019	KAPLAN000633	KAPLAN000726	*

<u>Exhibit No.</u>	<u>Description</u>	<u>Date</u>	<u>Beg Bates</u>	<u>End Bates</u>	<u>Plaintiff's Objections</u>
DX785	Supplemental Response to Defendants' Interrogatory No. 4 sent via email from Plaintiffs' counsel, Subject: Fairstein Enterprises LLC	2022-08-26			*
DX786	Arcade Publishing, Woody Allen, "Apropos of Nothing," https://www.skyhorsepublishing.com/arcade-publishing/9781951627348/apropos-of-nothing/ .		hyperlinked to Kaplan report		FRE 402, FRE 403 FRE 802
DX787	Arcade Publishing, Woody Allen, "Zero Gravity" https://www.skyhorsepublishing.com/arcade-publishing/9781956763294/zero-gravity/ .		hyperlinked to Kaplan report		FRE 402, FRE 403 FRE 802
DX788	Email chain from Mariska Hargitay to Linda Fairstein re Consider my resignation effective today	2019-06-04	JHF000001	JHF000001	**
DX789	Doug Bania, "Defamation Investigations: A Big Leap in Fighting Back," Vol. 28, No. 2, The Intellectual Property, Law Journal Newsletters, November 2021	2021-11			*
DX790	When They See Us Trailer Sentiment Report		DEFS145397	DEFS145405	**
DX791	Emmys Red Carpet Interview	2019-09-22	LF00050649	LF00050649	*

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DX792	Oprah Winfrey Presents: When They See Us Now	2019-06-12	DEFS174859	DEFS174859	* FRE 402, FRE 402 FRE 802